BellSouth ordering methodology

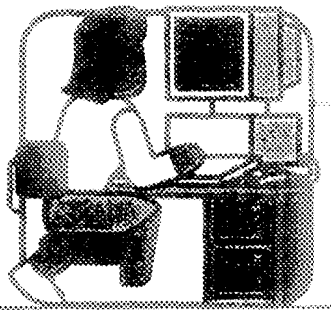
All BellSouth service requests are capable of flow-through

Residential Requests

RNS

FUEL

SOLAR



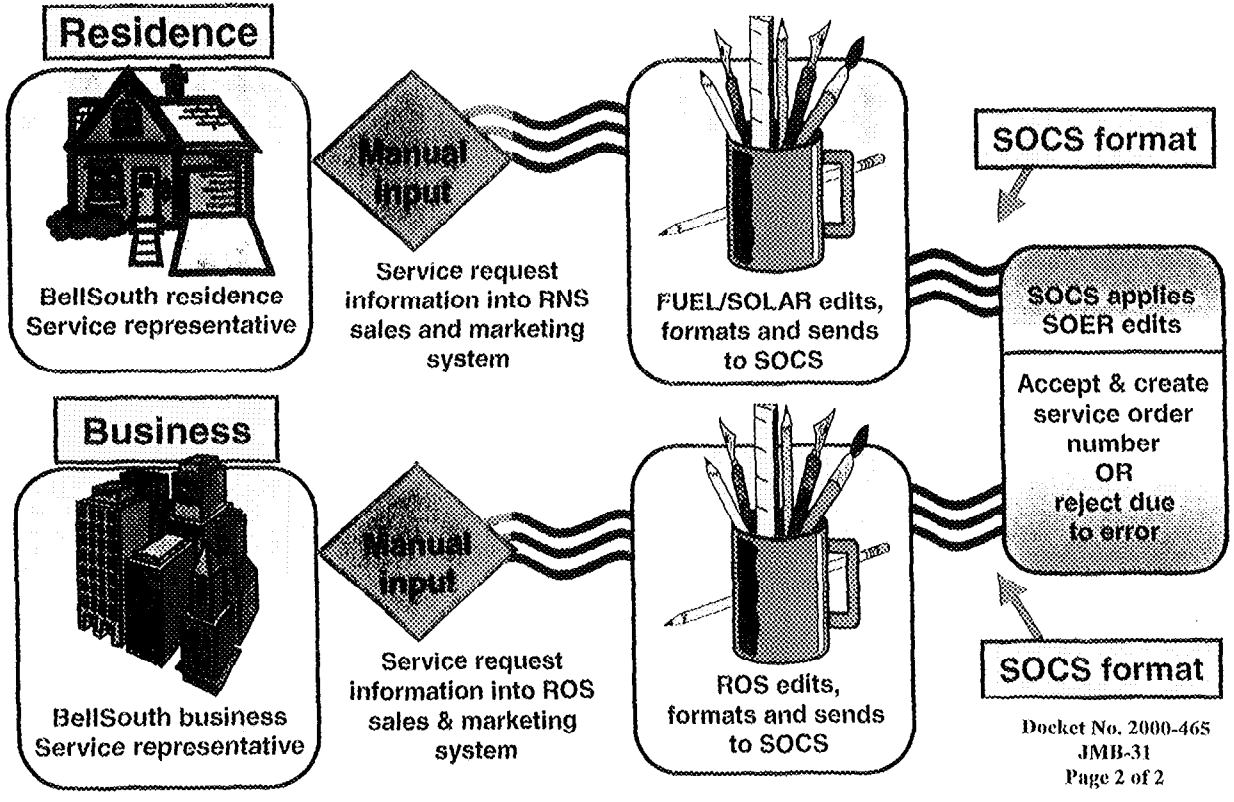
Bu ness Requests

ROS

SOCS
(SOER)

Service Order

How BellSouth service requests become service orders



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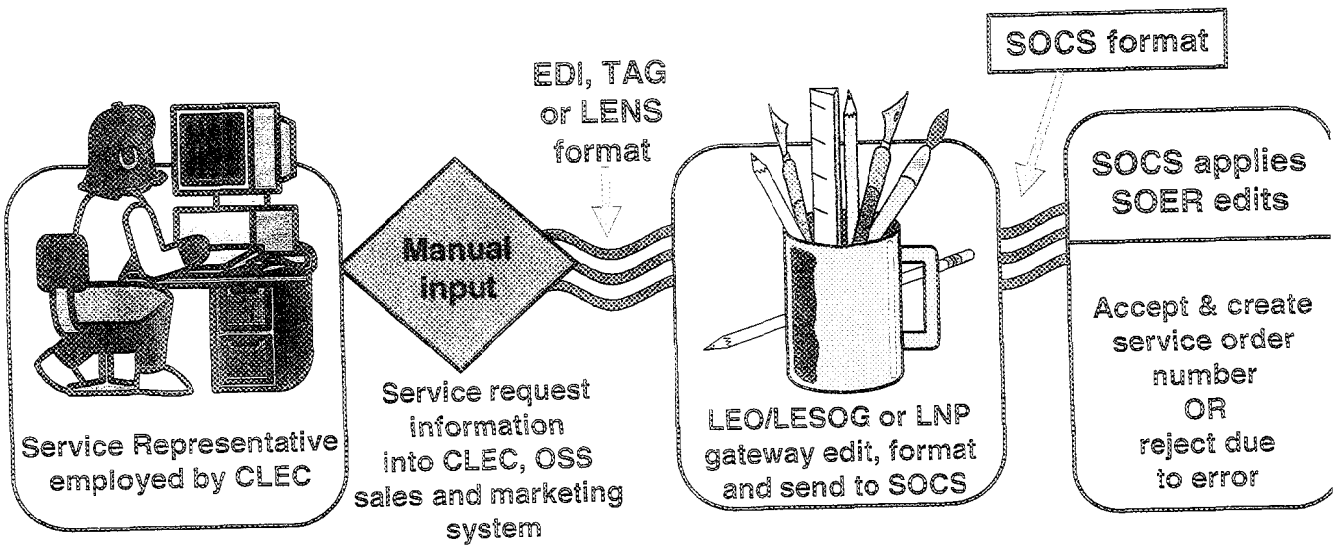
Service orders for BLS do not exist until acceptance by SOCS

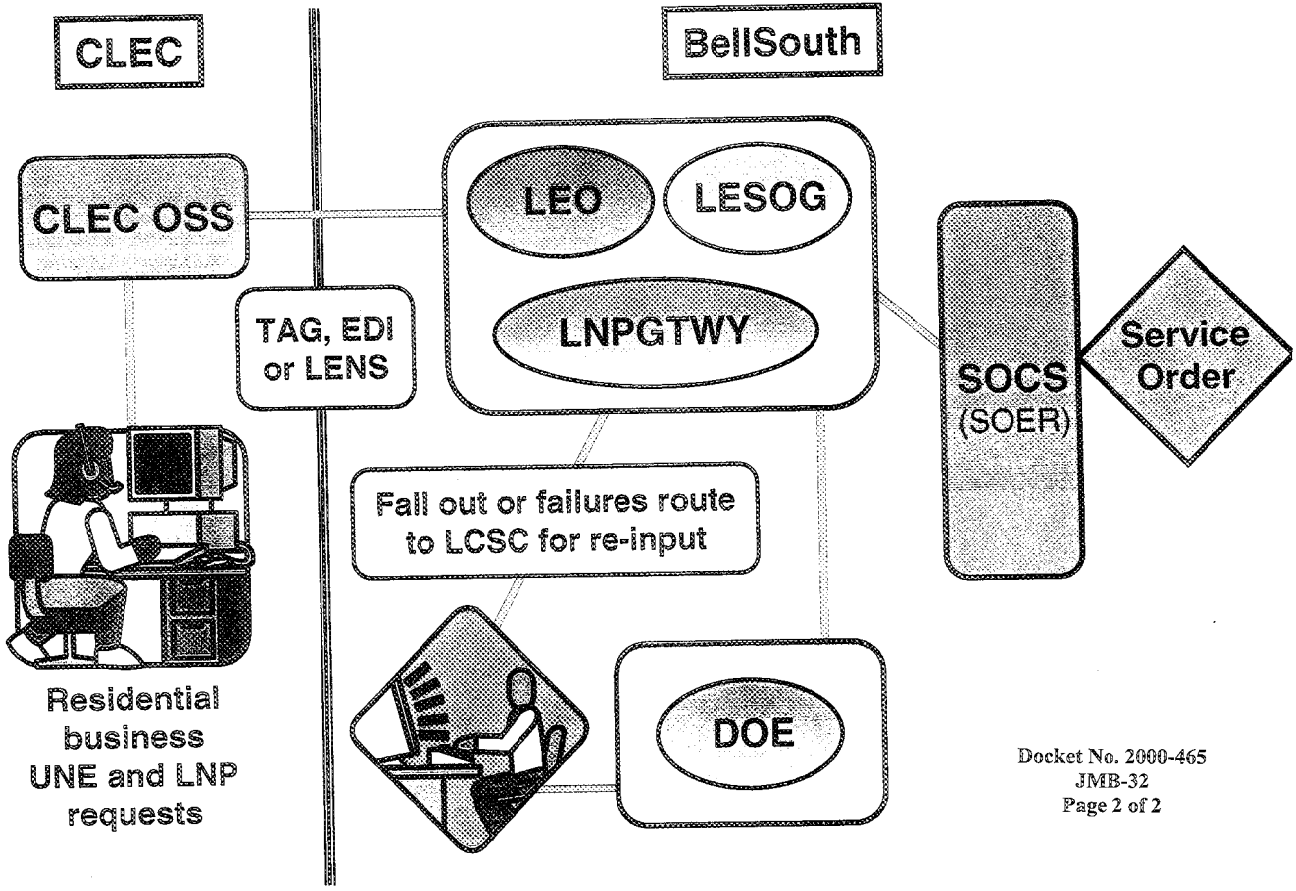
How CLEC service requests become service orders



Service orders for CLECs do not exist until acceptance by SOCS

CLEC ordering methodology

Only some CLP service requests are capable of flow-through



LNP FLOW-THROUGH DATA

	May-TAG	May-EDI	Jun-TAG	Jun-EDI	Jul-TAG	Jul-EDI	Aug-TAG	Aug-EDI	Sep-TAG	Sep-EDI	Oct-TAG	Oct-EDI
Total Mech LSRs	1206	5263	2509	6688	2015	6025	1646	9153	441	13285	2229	18571
Manual Fall Out	734	2093	1124	2795	1051	2286	720	2991	258	3436	1079	4832
Validated LSRs	382	3071	1289	3652	915	3854	894	5552	171	9355	1074	13085
BellSouth Caused System Failure	122	1437	247	1608	177	1484	334	2768	157	5247	574	6876
Flow Through Issued SOs	130	1152	654	1657	452	1666	376	2249	3	3507	441	5819
% Manual Fallout - LSRs	61%	40%	45%	42%	52%	38%	44%	33%	59%	26%	48%	26%
% BellSouth System Failure - LSRs	10%	27%	10%	24%	9%	25%	20%	30%	36%	39%	26%	37%
% BellSouth System Failure - VLSRs	32%	47%	19%	44%	19%	42%	37%	50%	92%	56%	53%	53%
% Total BellSouth Fallout + Failure - LSRs	71%	67%	55%	66%	61%	63%	64%	63%	94%	65%	74%	63%
% Maximum One-Touch CLP Orders	29%	33%	45%	33%	39%	37%	36%	37%	6%	35%	26%	38%

UNE FLOW-THROUGH DATA

	May-LENS	May-TAG	May-EDI	Jun-LENS	Jun-TAG	Jun-EDI	Jul-LENS	Jul-TAG	Jul-EDI	Aug-LENS	Aug-TAG	Aug-EDI	Sep-LENS	Sep-TAG	Sep-EDI	Oct-LENS	Oct-TAG	Oct-EDI
Total Mech LSRs	2219	15053	1901	2082	45123	2630	5421	36221	1988	7958	36853	3085	7879	28781	1423	9930	58758	3050
Manual Fall Out	370	2794	702	491	6676	695	973	7080	808	1538	5728	1059	1824	6071	1091	1975	10736	1742
Validated LSRs	1703	10024	895	1302	33651	1637	3282	23855	962	4597	25974	1767	5130	18784	128	6212	39020	961
BellSouth Caused System Failure	475	1882	430	469	6872	635	1150	5070	373	1796	6206	191	1718	4099	76	1884	8974	110
Flow Through Issued SOs	828	6838	265	578	24121	894	1799	15176	524	2355	17968	1525	3130	13661	27	3915	28187	766
% Manual Fallout - LSRs	17%	19%	37%	24%	15%	26%	18%	20%	41%	19%	16%	34%	23%	21%	77%	20%	18%	57%
% BellSouth System Failure - LSRs	21%	13%	23%	23%	15%	24%	21%	14%	19%	23%	17%	6%	22%	14%	5%	19%	15%	4%
% BellSouth System Failure - VLSRs	28%	19%	48%	36%	20%	39%	35%	21%	39%	39%	24%	11%	33%	22%	59%	30%	23%	11%
% Total BellSouth Fallout + Failure - LSRs	38%	31%	60%	46%	30%	51%	39%	34%	59%	42%	32%	41%	45%	35%	82%	39%	34%	61%
% Maximum One-Touch CLP Orders	62%	69%	40%	54%	70%	49%	61%	66%	41%	58%	68%	59%	55%	65%	18%	61%	66%	39%

BUSINESS FLOW-THROUGH DATA

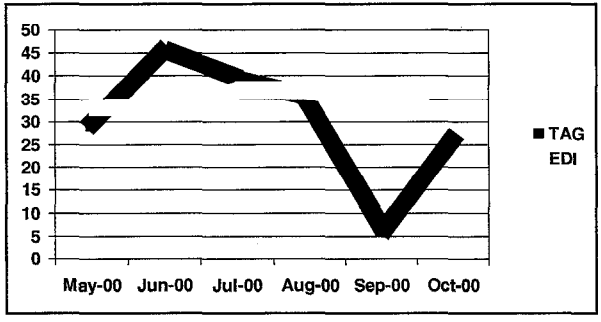
	May-LENS	May-TAG	May-EDI	Jun-LENS	Jun-TAG	Jun-EDI	Jul-LENS	Jul-TAG	Jul-EDI	Aug-LENS	Aug-TAG	Aug-EDI	Sep-LENS	Sep-TAG	Sep-EDI	Oct-LENS	Oct-TAG	Oct-EDI
Total Mech LSRs	6524	2015	1360	6739	2427	1250	6702	2224	1079	10438	1182	1619	9168	1056	1221	10826	1180	1644
Manual Fall Out	1367	1055	799	1175	1343	764	1312	1105	658	2059	476	970	2207	442	727	2676	500	1083
Validated LSRs	4304	756	446	4460	725	403	4447	861	328	6762	539	539	5725	463	403	6808	445	447
BellSouth Caused System Failure	1409	220	185	1413	225	134	1331	169	141	2552	164	224	2199	138	122	2440	128	113
Flow Through Issued SOs	2424	413	214	2647	398	241	2747	422	147	3605	312	256	3171	299	240	3855	257	250
% Manual Fallout - LSRs	21%	52%	59%	17%	55%	61%	20%	50%	61%	20%	40%	60%	24%	42%	60%	25%	42%	66%
% BellSouth System Failure - LSRs	22%	11%	14%	21%	9%	11%	20%	8%	13%	24%	14%	14%	24%	13%	10%	23%	11%	7%
% BellSouth System Failure - VLSRs	33%	29%	41%	32%	31%	33%	30%	20%	43%	38%	30%	42%	38%	30%	30%	36%	29%	25%
% Total BellSouth Fallout + Failure - LSRs	43%	63%	72%	38%	65%	72%	39%	57%	74%	44%	54%	74%	48%	55%	70%	47%	53%	73%
% Maximum One-Touch CLP Orders	57%	37%	28%	62%	35%	28%	61%	43%	26%	56%	47%	26%	52%	45%	30%	53%	47%	27%

RESIDENCE FLOW-THROUGH DATA

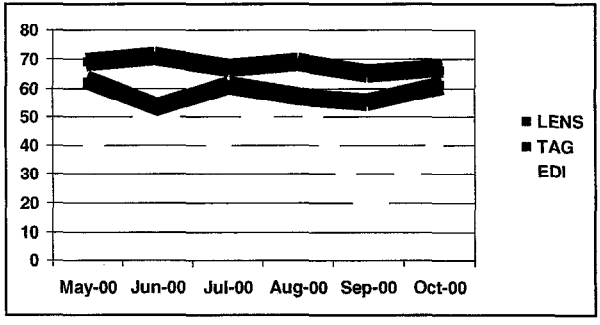
	May-LENS	May-TAG	May-EDI	Jun-LENS	Jun-TAG	Jun-EDI	Jul-LENS	Jul-TAG	Jul-EDI	Aug-LENS	Aug-TAG	Aug-EDI	Sep-LENS	Sep-TAG	Sep-EDI	Oct-LENS	Oct-TAG	Oct-EDI
Total Mech LSRs	139160	58350	3076	145667	61459	3992	136989	57961	4520	165707	57865	7036	151901	47810	7142	166029	65976	7641
Manual Fall Out	7806	1366	230	9704	1959	284	8162	1537	449	13833	4062	442	11595	1488	365	10619	2099	453
Validated LSRs	121868	54592	2535	125300	56223	3233	118230	52030	3624	135162	49185	5445	126148	42279	5643	140390	56601	5394
BellSouth Caused System Failure	9170	2235	582	9238	2352	801	7955	1799	798	13818	2042	1772	11242	1522	2121	10122	1433	2202
Flow Through Issued SOs	110029	51353	1817	113640	52909	2223	108205	49208	2578	119378	46469	3261	113417	40432	2986	127012	53734	2755
% Manual Fallout - LSRs	6%	2%	7%	7%	3%	7%	6%	3%	10%	8%	7%	6%	8%	3%	5%	6%	3%	6%
% BellSouth System Failure - LSRs	7%	4%	19%	6%	4%	20%	6%	3%	18%	8%	4%	25%	7%	3%	30%	6%	2%	29%
% BellSouth System Failure - VLSRs	8%	4%	23%	7%	4%	25%	7%	3%	22%	10%	4%	33%	9%	4%	38%	7%	3%	41%
% Total BellSouth Fallout + Failure - LSRs	12%	6%	26%	13%	7%	27%	12%	6%	28%	17%	11%	31%	15%	6%	35%	12%	5%	35%
% Maximum One-Touch CLP Orders	88%	94%	74%	87%	93%	73%	88%	94%	72%	83%	89%	69%	85%	94%	65%	88%	95%	65%

Percent maximum flow-through CLEC orders

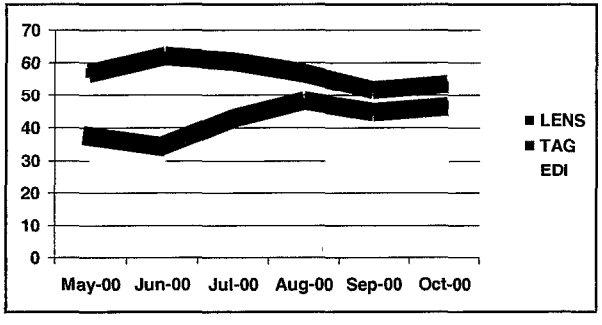
LNP – benchmark 85%



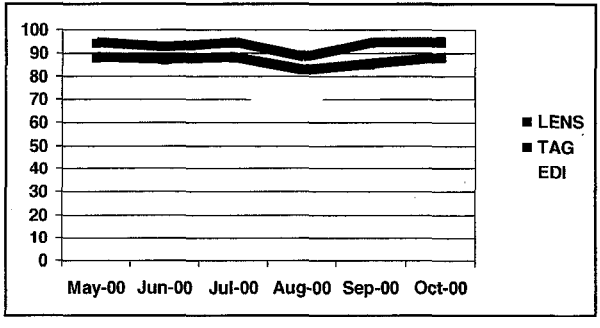
UNE – benchmark 85%



Business resale – benchmark 90%



Residence resale – benchmark 95%



Percent maximum flow-through CLEC orders

Type	Interface/ product	May 2000 %	June 2000 %	July 2000 %	August 2000 %	September 2000 %	October 2000 %
LNP Benchmark 85%	LENS	NA	NA	NA	NA	NA	NA
	TAG	29	45	39	36	6	26
	EDI	33	33	37	37	35	38
UNE Benchmark 85%	LENS	62	54	61	58	55	61
	TAG	69	70	66	68	65	66
	EDI	40	49	41	59	18	39
Business resale Benchmark 90%	LENS	57	62	61	56	52	53
	TAG	37	35	43	47	45	47
	EDI	28	28	26	26	30	27
Residence resale Benchmark 95%	LENS	88	87	88	83	85	88
	TAG	94	93	94	89	94	95
	EDI	74	73	72	69	65	65

Flow-Through Measure
Results Comparison

CLEC Aggregate Data / **AT&T Data** – Percent of Total Mechanized LSRs

Product	LPN	UNE	Business	Residence
Measure / Month	CLEC/ **AT&T**	CLEC/ **AT&T**	CLEC/ **AT&T**	CLEC/ AT&T
% Designed Manual Fallout				
May	44 / **67**	20 / **62**	33 / **0**	5 / NA
June	43 / **74**	16 / **60**	32 / **30**	6 / NA
July	42 / **81**	20 / **49**	31 / **59**	5 / NA
August	34 / **84**	17 / **81**	26 / **83**	8 / NA
September	27 / **74**	23 / **76**	29 / **9**	6 / NA
October	28 / **74**	20 / **80**	31 / **15**	5 / NA
% BellSouth System Error				
May	24 / **0**	15 / **20**	18 / **33**	6 / NA
June	20 / **0**	16 / **20**	17 / **0**	6 / NA
July	21 / **0**	15 / **33**	16 / **0**	5 / NA
August	29 / **0**	17 / **8**	22 / **8**	8 / NA
September	39 / **0**	15 / **16**	21 / **36**	7 / NA
October	36 / **1**	15 / **7**	20 / **15**	6 /NA
Total % Fallout Caused By BellSouth				
May	68 / **67**	35 / **82**	51 / **33**	11 / NA
June	63 / **74**	32 / **80**	47 / **30**	12 / NA
July	63 / **81**	35 / **82**	47 / **59**	10 / NA
August	63 / **84**	34 / **89**	48 / **91**	16 / NA
September	66 / **74**	38 / **92**	50 / **45**	13 / NA
October	64 / **74**	35 / **87**	51 / **30**	11 / NA
Maximum Possible % Flow-Through				
May	32 / **33**	65 / **18**	49 / **67**	89 / NA
June	37 / **19**	68 / **20**	53 / **70**	88 / NA
July	37 / **19**	65 / **18**	53 / **41**	90 / NA
August	37 / **16**	66 / **11**	52 / **11**	84 / NA
September	34 / **26**	62 / **8**	50 / **55**	87 / NA
October	36 / **26**	65 / **13**	49 / **70**	89 / NA

Flow-Through Measure
Results Comparison
Basic Flow-Through

- Reflects the actual flow-through that occurs without regard to cause.
  - Goes up and down with CLEC input errors.
  - Goes up and down with requests BellSouth has "designed" to fallout.
  - Goes up and down with failures of BellSouth's system to perform.

Basic Percent Flow-through = (Issued SO's) ÷ (Total Mech LSR's) X 100

BellSouth Achieved Flow-Through

- Reflects flow-through that would occur if CLECs make no input errors.
  - CLEC input errors have no impact on the reported result.
  - Goes up and down with requests BellSouth has "designed" to fallout.
  - Goes up and down with failures of BellSouth's system to perform.
  - The difference between Basic and Achieved Flow-Through reflects the impact of CLEC input errors.
  - The measure itself reflects the operational flow-through performance delivered by BellSouth's interfaces as designed and operating.

BellSouth Achieved Percent Flow-through = (Issued SO's) ÷ ∑ Total Mech LSR's) - [(Auto Clarification) + (CLEC Caused Fallout)] X 100

System Potential Flow-Through

- Reflects flow-through that would occur if CLECs make no input errors and BellSouth eliminates designed fallout.
  - CLEC input errors have no impact on the reported result.
  - BellSouth designed fallout has no impact on the reported result.
  - Goes up and down only with failures of BellSouth's system to perform.
  - The difference between Achieved and System Potential Flow-Through reflects what the performance could be if there were no design deficiencies.
  - The difference between the result reported and 100% reflects the failure of the interfaces to perform as designed.

System Potential Percent Flow-through = (Issued SO's) ÷ ∑ Total Mech LSR's) – [(Manual Fallout) + (Auto Clarification) + (CLEC Caused Fallout)] X 100

Flow-Through Measure Results Comparison

Actual Flow-Through Results EDI Interface CLEC Aggregate / **AT&T**

Product	LPN		UNE		Business		Residence	
Measure/ Interface	**CLEC**	**AT&T**	**CLEC**	**AT&T**	**CLEC**	**AT&T**	**CLEC**	**AT&T**
Basic EDI								
May	22	**0**	14	**1.6**	16	**44**	59	**NA**
June	25	**0**	34	**3.1**	19	**50**	56	**NA**
July	28	**0**	26	**1.2**	14	**18**	57	**NA**
August	25	**0**	49	**3.2**	16	**0**	46	**NA**
September	26	**0**	2	**3.8**	20	**27**	42	**NA**
October	30	**2**	25	**4.6**	15	**23**	36	**NA**
Achieved EDI								
May	25	**0**	19	**2.0**	18	**57**	69	**NA**
June	27	**0**	40	**3.7**	21	**62**	67	**NA**
July	31	**0**	31	**1.4**	16	**23**	67	**NA**
August	28	**0**	55	**3.5**	18	**0**	60	**NA**
September	28	**0**	2.3	**4**	22	**38**	55	**NA**
October	33	**3**	29	**4.8**	17	**43**	39	**NA**
Potential EDI								
May	45	**0**	38	**8**	54	**57**	76	**NA**
June	51	**0**	58	**13**	64	**100**	74	**NA**
July	53	**0**	58	**3.4**	51	**100**	76	**NA**
August	45	**0**	89	**29**	53	**0**	65	**NA**
September	40	**0**	26	**19**	66	**43**	58	**NA**
October	46	**67**	87	**40**	69	**60**	56	**NA**

Flow-Through Measure
Results Comparison

Aggregated Interface and Product Results

Measure	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct
Basic	82	78	76	74	76	73	70	69	69	68
Achieved	89	86	84	83	84	82	82	77	78	79
Potential	95	93	92	92	91	90	91	87	88	89

Disaggregated Interface - Disaggregated Product Results
May 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (76)				
• EDI	22	14	16	59
• TAG	11	45	20	88
• LENS	-	37	37	79
Achieved (84)				
• EDI	25	19	18	69
• TAG	13	59	24	93
• LENS	-	49	47	86
Potential (91)				
• EDI	45	38	54	76
• TAG	52	78	65	96
• LENS	-	64	63	92
Volumes				
• EDI	5,263	1,901	1,360	3,076
• TAG	1,206	15,053	2,015	58,350
• LENS	-	2,219	6,524	139,160
• Total	6,469	19,173	9,899	200,586
LEO Total = 229,658	Good = 197,510		Bad = 32,148	% Bad = 14%

Flow-Through Measure Results Comparison

Disaggregated Interface - Disaggregated Product Results June 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (73)				
• EDI	25	34	19	56
• TAG	26	53	16	86
• LENS	-	28	39	78
Achieved (82)				
• EDI	27	40	21	67
• TAG	32	64	20	95
• LENS	-	38	51	84
Potential (90)				
• EDI	51	58	64	74
• TAG	73	77	64	96
• LENS	-	55	65	92
Volumes				
• EDI	6,688	2,630	1,250	3,992
• TAG	2,509	45,123	2,427	61,459
• LENS	-	2,083	6,739	145,667
• Total	9,197	49,839	10,416	211,118
LEO Total = 271,373	Good = 207,126	Bad = 64,247	% Bad = 24%	

Flow-Through Measure Results Comparison

Disaggregated Interface - Disaggregated Product Results July 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (70)				
• EDI	28	26	14	57
• TAG	23	42	19	85
• LENS	-	34	41	79
Achieved (82)				
• EDI	31	31	16	67
• TAG	27	56	24	93
• LENS	-	46	51	87
Potential (91)				
• EDI	53	58	51	76
• TAG	72	75	71	96
• LENS	-	61	67	93
Volumes				
• EDI	6,025	1,988	1,079	4,520
• TAG	2,015	36,221	2,224	57,961
• LENS	-	5,241	6,702	136,989
• Total	8,040	43,450	10,005	199,470
LEO Total = 252,925	Good = 194,950	Bad = 57,975	% Bad = 23%	

Flow-Through Measure
Results Comparison

Disaggregated Interface - Disaggregated Product Results
August 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (69)				
• EDI	25	49	16	46
• TAG	23	49	26	80
• LENS	-	30	35	72
Achieved (77)				
• EDI	28	55	18	60
• TAG	26	60	33	88
• LENS	-	41	44	81
Potential (87)				
• EDI	45	89	53	65
• TAG	52	74	66	96
• LENS	-	57	59	90
Volumes				
• EDI	9,153	3,085	1,619	7,036
• TAG	1,646	36,853	1,182	57,865
• LENS	-	7,958	10,438	165,707
• Total	10,799	47,896	13,239	230,608
LEO Total = 291,743	Good = 226,657		Bad = 65,086	% Bad = 22%

Flow-Through Measure Results Comparison

Disaggregated Interface - Disaggregated Product Results
September 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (69)				
• EDI	26	2	20	42
• TAG	1	47	28	84
• LENS	-	40	35	75
Achieved (78)				
• EDI	28	2	22	55
• TAG	1	57	34	93
• LENS	-	47	42	83
Potential (88)				
• EDI	40	26	66	58
• TAG	2	77	68	96
• LENS	-	65	59	91
Volumes				
• EDI	13,285	1,423	1,221	7,142
• TAG	460	28,781	1,056	47,810
• LENS	-	7,879	9,168	151,901
• Total	13,745	38,083	11,445	206,853
LEO Total = 256,381	Good = 199,711	Bad = 56,670	% Bad = 22%	

Flow-Through Measure Results Comparison

Disaggregated Interface - Disaggregated Product Results October 2000

Product	LPN	UNE	Business	Residence
Measure/ Interface				
Basic (68)				
• EDI	31	25	15	36
• TAG	20	48	22	81
• LENS	-	39	36	76
Achieved (79)				
• EDI	33	29	17	39
• TAG	21	59	29	94
• LENS	-	50	43	86
Potential (89)				
• EDI	46	87	69	56
• TAG	42	76	67	97
• LENS	-	67	61	93
Volumes				
• EDI	18,571	3,050	1,644	7,641
• TAG	2,229	58,758	1,180	65,976
• LENS	-	9,930	10,826	166,029
• Total	20,800	71,738	13,650	239,646
LEO Total = 325,034	Good = 235,055	Bad = 89,979	% Bad = 24%	

REPORT NAME: CLEC LSR Information
REPORT PERIOD: 06/01/2000 to 06/30/2000
CLEC: 7125 –

NOTES FOR REPORT ON CLEC LSR INFORMATION

This report contains information on all mechanically submitted, non LNP LSRs that BellSouth processed for your company during the period noted above. For the purpose of this report, an LSR is a distinct cc/pon/ver combination. The data presented has several lines per LSR and where more than one line is needed to determine the status of an LSR (e.g., an LSR flows through when certain conditions are found/not found on three lines), it's still counted as one LSR. Each different version of a particular PON is considered a separate LSR within BellSouth. Below, you will find explanations for each column and its contents.

CC – Your company code.

PON – Your purchase order number as received on the LSR.

VER – The LSR version.

TIMESTAMP – Timestamp of note or error posting to LEO database.

TYPE – Notes type. See explanations of each type in the next section.

ERR# – ENCORE error number. Please refer to your LEO Implementation Guide for complete explanations of each error number.

NOTE OR ERROR DESCRIPTION – Actual text of the note or error as found in the LEO database.

When comparing the results of this LSR information file with the flow through aggregate report, please note that this LSR information file contains LSR data for all submission types, (LENS, EDI, TAG), but are separated by cc while there's a separate line for each submission type on the aggregate report, the intent of this LSR information file is for the reconciliation for all LSRs submitted regardless of submission type.

NOTES TYPES EXPLAINED

There are several different types of notes, each with its own unique identifier. Many of these are internal to BellSouth, and will not be useful to you. Others will tell you immediately the type of note that you are viewing. For example, a type of 'C280' refers to an internal BellSouth program which generated the note text, and 'ERR' means that the note text contains an actual error message. Please note that each LSR may receive multiple errors and messages. All errors and messages must be taken into account in order to determine the treatment for that particular LSR.

TYPE	EXPLANATION
C###	Refers to the actual BellSouth program that generated the note text
CANC	Automatically cancelled by system due to inactivity
CLAR	Clarification message
CLM	LSR has been claimed
CRR	Mechanically generated order has been corrected
ERR	The notes field contains an error message, and the ERR# field is populated
FCCN	Manual FOC send
ISS	Manually issued order
LOAD	Successful change in the LEO database
MECH	Means that the LSR in question was received via a mechanized method
NAVI	Navigation message – where the LSR was sent at that time
RETF	Return feed

SRET SOCS return message
SGNT LSR has been inserted to TSIGNOUT queue and is waiting to be claimed
WEB Message is posted to the web (LENS)

FLOWTHROUGH LOGIC

This section contains an explanation of the process by which BellSouth determines whether or not an LSR has flowed through the system. Please note the following: as each of the flowthrough steps is executed, LSRs that meet that step's criteria are removed from the base pool of LSRs, and are not included in any further calculations. For example, an LSR with both an auto clarification and a MANUALP fallout condition will be counted only once in the flow through calculation. In this example, the LSR will appear in the planned manual 'bucket' since the manual fallout step is executed before the auto clarification step.
In addition, an LSR with more than one error of the same type, e.g., auto clarification, will be counted only once in the flow through calculation. A list of all errors by error code and quantity can be found in the Flow Through Error Analysis report.

The steps for determining flowthrough are as follows (in order):

FATAL REJECTS

Finds all fatal reject records. A fatal reject is a record the system identifies as having severe CLEC errors that prohibit further processing and is returned to the CLEC. Fatal rejects are identified by looking for a note containing 'LSR REJECTED' and a note type of 'RETF' or 'C475', both of which indicate an LSR was rejected by the system. A fatally rejected LSR does not retain its initiating source system ID (i.e., LENS, EDI, TAG); therefore, it is impossible to determine the source of a fatal reject. Please note that fatal rejects are not a part of the flow through calculation and are NOT identified in this report.

AUTO CLARIFICATIONS

Finds all auto clarification records. An auto clarification record is a record the system identifies as having a CLEC error and returns the record to the CLEC with no further processing. All auto clarification LSRs contain the words 'AUTO CLARIFICATION' in the notes field.

PLANNED MANUALS

Finds all planned manual and manual clarification records. A planned manual LSR is an LSR that the system is not designed to handle mechanically due to its complexity. As a result, the LSR falls out for manual handling so that processing can be completed. A planned manual LSR will have the text 'MANUALP' as the first seven characters of the notes field.

FLOWTHROUGH LSRs

Finds all records that have had service orders issued in SOCS, i.e., all records that flowed through the system. An LSR is defined as having flowed through if the following logic is true:

- The note contains the text 'FOC STAGED FOR LSR' ***OR*** 'FOC AND CN STAGED FOR LSR'

AND

- The note contains the text 'ORDER NUM' ***OR*** 'INFO-ORDER' ***OR*** 'CANCELLED'

SYSTEM FALLOUT

Any LSRs that did not flow through the systems and were not planned manuals, fatal rejects, or auto clarifications are defined as system fallout.

CLEC CAUSED FALLOUT

CLEC caused fallout is defined as those LSRs with clarifications returned and/or clarifications posted.

CLARIFICATIONS RETURNED

Find all clarification returned LSRs. A clarification returned designation indicates than an LSR was received and was LESOG eligible, but could not flow through because additional information was required in order to process the LSR. The LSR requires a Bellsouth representative to review it; if the error is determined to be a CLEC error, the LSR is clarified back to the CLEC. This LSR contains the text 'CLARIFICATIONS RETURNED' in the notes field.

CLARIFICATIONS POSTED

Finds all clarifications posted LSRs. A clarification posted is identical to a clarification returned except that the clarification is posted to the web (LENS) rather than being sent to the CLEC via EDI or TAG. A clarification posted LSR contains the text 'CLARIFICATIONS POSTED' in the notes field.

BST CAUSED FALLOUT

All other LSRs that fell out of the system are counted, by default, as 'BST Caused Fallout'.

LSRS AND ASSOCIATED MESSAGES FOR THIS PERIOD

LIST OF LSRS WITH ACTIVITY DURING THE MONTH THAT WERE INCLUDED IN THIS MONTH'S FLOW THROUGH CALCULATION.

The following is a list of the LSRs originated this month and included in the flow through calculation, and all messages associated with each LSR received. Again, please remember that you must take into account all the messages and errors for each LSR to determine its treatment.

CC	PON	VER	TIMESTAMP	TYPE	ERR#	NOTE OR ERROR DESCRIPTION
7125	ZX4043499578	00	2000-06-01 09:45:20.1295	CB18		LSR LOADED AS MECHANIZED
7125	ZX4043499578	00	2000-06-01 09:45:20.8131	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX4043499578	00	2000-06-01 09:46:41.3445	ERR	7905	RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT
7125	ZX4043499578	00	2000-06-01 09:46:41.3991	C380		"AUTO CLARIFICATION" PLACED BY LESOG
7125	ZX4043499578	00	2000-06-01 09:46:41.6959	C475		CLARIFICATIONS RETURNED- G7905
7125	ZX4043499578	00	2000-06-01 09:46:41.6962	C475		855 ISSUED RETURN-FEED # 0002 CLARIFICATION REQUESTED
7125	ZX4043499578	02	2000-06-01 11:30:08.9119	CB18		LSR LOADED AS MECHANIZED
7125	ZX4043499578	02	2000-06-01 11:30:09.3329	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX4043499578	02	2000-06-01 11:30:58.8882	C380		INFO-ORDER NUM: NO9NMRG7
7125	ZX4043499578	02	2000-06-01 11:30:58.9887	C380		SERVICE ORDER UPDATE PLACED BY LESOG
7125	ZX4043499578	02	2000-06-01 11:41:54.7585	C280		8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZX4043499578	02	2000-06-01 11:41:55.2552	C475		865 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZX7704239008	00	2000-06-07 13:30:23.5817	CB18		LSR LOADED AS MECHANIZED
7125	ZX7704239008	00	2000-06-07 13:30:23.9364	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX7704239008	00	2000-06-07 13:33:46.2940	C380		INFO-OUT TO SOER
7125	ZX7704239008	00	2000-06-07 13:33:46.3575	C380		SERVICE ORDER UPDATE PLACED BY LESOG
7125	ZX7704239008	00	2000-06-07 13:33:46.3596	C380		INFO-ORDER NUM: NO6YC3R5
7125	ZX7704239008	00	2000-06-07 13:56:36.1796	C280		8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZX7704239008	00	2000-06-07 13:56:36.6670	C475		855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZX7705907400	00	2000-06-01 12:00:07.5985	CB18		LSR LOADED AS MECHANIZED
7125	ZX7705907400	00	2000-06-01 12:00:08.1144	C865		LSR HAS BEEN SENT TO LESOG
7125	ZX7705907400	00	2000-06-01 12:01:19.7597	C380		INFO-ORDER NUM: NOBW4WJ4
7125	ZX7705907400	00	2000-06-01 12:01:19.8539	C380		SERVICE ORDER UPDATE PLACED BY LESOG
7125	ZX7705907400	00	2000-06-01 12:28:15.8293	C280		8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZX7705907400	00	2000-06-01 12:28:16.1204	C475		855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXALTY0001073A	00	2000-06-30 15:00:36.6672	CB18		LSR LOADED AS MECHANIZED
7125	ZXALTY0001073A	00	2000-06-30 15:00:37.7132	C865		LSR HAS BEEN SENT TO LESOG
7125	ZXALTY0001073A	00	2000-06-30 15:02:03.5644	ERR	7905	RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT
7125	ZXALTY0001073A	00	2000-06-30 15:02:03.6303	C380		"AUTO CLARIFICATION" PLACED BY LESOG
7125	ZXALTY0001073A	00	2000-06-30 15:02:04.0723	C475		CLARIFICATIONS RETURNED- G7905
7125	ZXALTY0001073A	00	2000-06-30 15:02:04.0736	C475		855 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED

7125 ZXATLY0000449B 03 2000-06-07 12:45:17.1212 CB18 LSR LOADED AS MECHANIZED
7125 ZXATLY0000449B 03 2000-06-07 12:45:17.5417 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000449B 03 2000-06-07 12:48:45.2506 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000449B 03 2000-06-07 12:48:45.6081 SGNT DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000449B 03 2000-06-07 12:48:45.6148 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000449B 03 2000-06-08 16:00:21.4585 SGNT DB02C240 UPDATED TSIGNOUT
7125 ZXATLY0000449B 03 2000-06-08 16:00:21.5487 ERR 1000 DATP LOOP SERVICE PG AND PRS CDC X1772.
7125 ZXATLY0000449B 03 2000-06-08 16:00:37.5337 CLAR Clarify Requested for VER-9
7125 ZXATLY0000449B 03 2000-06-08 16:00:37.5409 SGNT DB02C240 DELETED FROM TSIGNOUT
7125 ZXATLY0000449B 03 2000-06-08 16:00:38.1441 C475 CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0000449B 03 2000-06-08 16:00:38.1448 C475 865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0000449B 04 2000-06-13 14:30:17.7535 CB18 LSR LOADED AS MECHANIZED
7125 ZXATLY0000449B 04 2000-06-13 14:30:18.2018 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000449B 04 2000-06-13 14:30:51.1352 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000449B 04 2000-06-13 14:30:51.1992 SGNT DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000449B 04 2000-06-13 14:30:51.2020 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000449B 04 2000-06-15 12:36:51.7925 CLM LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000449B 04 2000-06-15 12:36:51.8370 CLM LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000449B 04 2000-06-15 12:40:05.9476 ERR 1000 DUE TO RPON. CDC X1772
7125 ZXATLY0000449B 04 2000-06-15 12:40:17.4481 CLAR Clarify Requested for VER-9
7125 ZXATLY0000449B 04 2000-06-15 12:40:17.6631 C475 CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0000449B 04 2000-06-15 12:40:17.6635 C475 865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0000449B 05 2000-06-16 09:15:28.9593 CB18 LSR LOADED AS MECHANIZED
7125 ZXATLY0000449B 05 2000-06-16 09:15:29.6995 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000449B 05 2000-06-16 09:16:24.1009 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000449B 05 2000-06-16 09:16:24.1678 SGNT DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000449B 05 2000-06-16 09:16:24.1732 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000449B 05 2000-06-20 07:51:53.5533 CLM LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000449B 05 2000-06-20 07:51:53.5764 CLM LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000449B 05 2000-06-20 07:55:25.6176 ISS ORDER CO1YCFQ7 DUE 6-27-00. GGOLAR X1753
7125 ZXATLY0000449B 05 2000-06-20 08:11:54.4058 C280 8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000449B 05 2000-06-20 08:11:54.9116 C475 865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000449B 05 2000-06-22 17:52:31.0542 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXATLY0000449B 06 2000-06-23 13:15:03.7464 CB18 LSR LOADED AS MECHANIZED
7125 ZXATLY0000449B 06 2000-06-23 13:15:04.1584 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000449B 06 2000-06-23 15:28:31.2963 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000449B 06 2000-06-23 15:28:31.6232 SGNT DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000449B 06 2000-06-23 15:28:31.7512 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000449B 06 2000-06-27 10:38:13.8737 CLM LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000449B 06 2000-06-27 10:38:13.9760 CLM LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000449B 06 2000-06-27 10:38:59.0475 ISS ORD CO1YCFQ7 DD 7-10-00 CDC X1772
7125 ZXATLY0000449B 06 2000-06-27 10:56:34.6589 C280 8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000449B 06 2000-06-27 10:56:34.8858 C475 865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000449B 06 2000-06-27 10:56:37.0328 C475 POS ISSUED, SOCS STATUS - PD PENDING ORDER
7125 ZXATLY0000467A 03 2000-06-03 08:56:30.9809 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXATLY0000467A 04 2000-06-07 09:15:05.9534 CB18 LSR LOADED AS MECHANIZED
7125 ZXATLY0000467A 04 2000-06-07 09:15:06.6789 C865 LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000467A 04 2000-06-07 09:15:38.5574 C380 MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000467A 04 2000-06-07 09:15:38.7386 SGNT DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000467A 04 2000-06-07 09:15:38.7419 C380 LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000467A 04 2000-06-07 13:56:22.5966 CLM LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0000467A 04 2000-06-07 13:56:22.6357 CLM LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0000467A 04 2000-06-07 13:56:53.2471 C280 8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000467A 04 2000-06-07 13:56:53.4283 C475 865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000467A 04 2000-06-07 14:12:23.7352 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXATLY0000467A 04 2000-06-09 05:27:14.0066 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125 ZXATLY0000597C 02 2000-06-01 08:26:10.0632 CLM LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000597C 02 2000-06-01 08:26:10.1472 CLM LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000597C 02 2000-06-01 08:26:47.4091 C280 8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"

7125	ZXATLY0001063	05	2000-06-14 11:52:39.2635	SGNT	DB02C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001063	05	2000-06-14 11:52:39.2662	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001063	05	2000-06-16 16:43:01.6850	CLM	LSR CLAIMED BY CUID - PKYQHYK
7125	ZXATLY0001063	05	2000-06-16 16:43:01.7073	CLM	LSR CLAIMED BY CUID - PKYQHYK
7125	ZXATLY0001063	05	2000-06-19 08:51:51.3938	ISS	ISSUED ORDER CO22R065 6 LOOPS CIRCUITS IN ORDER 38 LYFU 646774..SB THROUGH 646779 ROBIN X 1745
7125	ZXATLY0001063	05	2000-06-19 08:55:40.7215	NOTE	DUE DATE IS 06-26-00 RW X 1745
7125	ZXATLY0001063	05	2000-06-19 08:56:35.0606	C280	8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001063	05	2000-06-19 08:56:35.4047	C475	855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXATLY0001063	05	2000-06-19 08:56:40.0220	C475	POS ISSUED, SOCS STATUS - PD PENDING ORDER
7125	ZXATLY0001063	05	2000-06-19 09:12:52.8656	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-19 09:13:13.1182	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-26 14:56:23.0291	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-26 14:56:27.4855	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-26 20:56:17.3215	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001063	05	2000-06-27 17:57:31.9135	C280	865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125	ZXATLY0001063	05	2000-06-27 17:57:32.2066	C475	865 ISSUED RETURN-FEED # 0003 COMPLETION SENT
7125	ZXATLY0001161	00	2000-06-02 06:27:32.0674	CLM	LSR CLAIMED BY CUID - PKCQXFG
7125	ZXATLY0001161	00	2000-06-02 06:27:32.1797	CLM	LSR CLAIMED BY CUID - PKCQXFG
7125	ZXATLY0001161	00	2000-06-02 07:34:22.7523	ISS	CO6870C2 DD 06-13-00 CYNTHIA X1715
7125	ZXATLY0001161	00	2000-06-02 07:56:23.6832	C280	8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001161	00	2000-06-02 07:56:24.0384	C475	855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXATLY0001161	00	2000-06-02 07:56:24.2608	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-05 10:27:16.4582	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-05 11:56:53.3621	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-13 16:17:09.1051	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-13 19:56:46.2419	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001161	00	2000-06-14 07:56:23.9544	C280	865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125	ZXATLY0001161	00	2000-06-14 07:56:24.4842	C475	865 ISSUED RETURN-FEED # 0002 COMPLETION SENT
7125	ZXATLY0001176	00	2000-06-01 09:45:19.4021	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001176	00	2000-06-01 09:45:20.1226	C865	LSR HAS BEEN SENT TO LESOG
7125	ZXATLY0001176	00	2000-06-01 09:45:53.6327	C380	MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125	ZXATLY0001176	00	2000-06-01 09:45:53.6973	SGNT	DB02C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001176	00	2000-06-01 09:45:53.7003	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001176	00	2000-06-03 11:57:56.7740	CLM	LSR CLAIMED BY CUID - LZBKNZG
7125	ZXATLY0001176	00	2000-06-03 11:57:56.8641	CLM	LSR CLAIMED BY CUID - LZBKNZG
7125	ZXATLY0001176	00	2000-06-03 11:58:41.5439	ISS	ORDER CO8PJGB1 DUE 06-13-00. GGOLAR X2007
7125	ZXATLY0001176	00	2000-06-03 13:11:27.2593	C280	8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001176	00	2000-06-03 13:11:28.0373	C475	855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXATLY0001176	00	2000-06-03 13:11:28.2559	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001176	00	2000-06-13 12:36:53.0538	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001176	00	2000-06-13 12:37:45.1928	C280	865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125	ZXATLY0001176	00	2000-06-13 12:37:45.4777	C475	865 ISSUED RETURN-FEED # 0002 COMPLETION SENT
7125	ZXATLY0001190	00	2000-06-01 10:45:06.4239	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001190	00	2000-06-01 10:45:06.9094	C865	LSR HAS BEEN SENT TO LESOG
7125	ZXATLY0001190	00	2000-06-01 10:45:52.6695	C380	MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125	ZXATLY0001190	00	2000-06-01 10:45:52.7347	SGNT	DB02C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001190	00	2000-06-01 10:45:52.7379	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001190	00	2000-06-05 08:20:06.1901	CLM	LSR CLAIMED BY CUID - LZBKNZG
7125	ZXATLY0001190	00	2000-06-05 08:20:06.2975	CLM	LSR CLAIMED BY CUID - LZBKNZG
7125	ZXATLY0001190	00	2000-06-05 08:20:45.0147	ISS	ORDER CO06NFJ7 DUE 6-14-00. GGOLAR X2007
7125	ZXATLY0001190	00	2000-06-05 08:41:39.8845	C280	8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001190	00	2000-06-05 08:41:40.1992	C475	855 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXATLY0001190	00	2000-06-05 08:41:42.1827	C475	POS ISSUED, SOCS STATUS - PD PENDING ORDER
7125	ZXATLY0001190	00	2000-06-05 08:41:55.0232	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001190	00	2000-06-05 08:41:56.6434	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001190	00	2000-06-05 09:12:36.3617	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001190	00	2000-06-05 09:12:45.8058	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.
7125	ZXATLY0001190	02	2000-06-12 15:45:03.6816	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001190	02	2000-06-12 15:45:04.0696	C865	LSR HAS BEEN SENT TO LESOG

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7125 ZXATLY0000597C  02 2000-06-01 08:26:47.6845  C475    865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000597C  02 2000-06-01 08:27:22.0742  ISS     ORD COB2NOM9 DUE 6-12-00 3B.LYFU.645446..SB X2007 GGOLAR
7125 ZXATLY0000597C  02 2000-06-02 10:26:30.6886  C475    POS ISSUED, SOCS STATUS - PD      PENDING ORDER
7125 ZXATLY0000597C  02 2000-06-12 22:26:17.8001  C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000597C  02 2000-06-12 22:26:19.5957  C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000597C  02 2000-06-13 13:43:15.1749  C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000597C  02 2000-06-13 16:13:35.5195  C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000597C  02 2000-06-13 16:14:17.2413  C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000597C  02 2000-06-13 16:14:49.3034  C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000597C  02 2000-06-13 17:34:10.2445  C280    PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000597C  02 2000-06-13 17:35:41.4594  C280    865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED TO "P"
7125 ZXATLY0000597C  02 2000-06-13 17:35:41.7736  C475    865 ISSUED RETURN-FEED # 0003 COMPLETION SENT
7125 ZXATLY0000655E  02 2000-06-01 09:15:08.0237  CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000655E  02 2000-06-01 09:15:08.6711  C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000655E  02 2000-06-01 09:15:48.1420  C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000655E  02 2000-06-01 09:15:48.2065  SGNT     DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000655E  02 2000-06-01 09:15:48.2100  C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000655E  02 2000-06-03 12:45:23.7425  CLM     LSR CLAIMED BY CUID - BLWNCLZ
7125 ZXATLY0000655E  02 2000-06-03 12:45:23.7826  CLM     LSR CLAIMED BY CUID - BLWNCLZ
7125 ZXATLY0000655E  02 2000-06-03 12:47:25.8247  ERR  1000 BI1 IS REQUIRED WHEN BAN 1 IS POPULATED. JAMES EXT  1764
7125 ZXATLY0000655E  02 2000-06-03 12:47:31.5997  CLAR     Clarify Requested for VER-9
7125 ZXATLY0000655E  02 2000-06-03 12:47:32.1459  C475    CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0000655E  02 2000-06-03 12:47:32.1462  C475    865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0000655E  03 2000-06-07 08:30:16.6342  CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000655E  03 2000-06-07 08:30:17.1258  C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000655E  03 2000-06-07 08:30:33.6913  C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000655E  03 2000-06-07 08:30:33.8201  SGNT     DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000655E  03 2000-06-07 08:30:33.8227  C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000655E  03 2000-06-08 10:10:18.4806  CLM     LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000655E  03 2000-06-08 10:10:18.4810  CLM     LSR CLAIMED BY CUID - PNDNTFB
7125 ZXATLY0000655E  03 2000-06-08 10:11:26.0752  ERR  1000 BN1 FIELD INVALID CDC X1772.
7125 ZXATLY0000655E  03 2000-06-08 10:11:50.7639  CLAR     Clarify Requested for VER-9
7125 ZXATLY0000655E  03 2000-06-08 10:11:51.3961  C475    CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0000655E  03 2000-06-08 10:11:51.3967  C475    865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0000655E  04 2000-06-09 09:15:06.2018  CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000655E  04 2000-06-09 09:15:07.0282  C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000655E  04 2000-06-09 09:23:24.9850  C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000655E  04 2000-06-09 09:23:25.0911  SGNT     DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000655E  04 2000-06-09 09:23:25.1038  C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000655E  04 2000-06-12 07:31:01.9251  CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000655E  04 2000-06-12 07:31:01.9977  CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000655E  04 2000-06-12 07:39:17.5241  ERR  1000 BI1 INCORRECT. RPON ZXATLY0000655D. GGOLAR X1753
7125 ZXATLY0000655E  04 2000-06-12 07:39:39.9724  CLAR     Clarify Requested for VER-9
7125 ZXATLY0000655E  04 2000-06-12 07:39:40.6540  C475    CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0000655E  04 2000-06-12 07:39:40.6544  C475    865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0000655E  05 2000-06-13 08:30:12.2355  CB18    LSR LOADED AS MECHANIZED
7125 ZXATLY0000655E  05 2000-06-13 08:30:12.6810  C865    LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000655E  05 2000-06-13 08:30:59.4274  C380    MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000655E  05 2000-06-13 08:30:59.5403  SGNT     DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000655E  05 2000-06-13 08:30:59.5458  C380    LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000655E  05 2000-06-14 16:20:27.7834  CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000655E  05 2000-06-14 16:20:27.7862  CLM     LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000655E  05 2000-06-14 16:22:07.5055  ERR  1000 BAN1 OF N INCORRECT PLS VER. RPON ZXATLY0000655D. GGOLAR X1753
7125 ZXATLY0000655E  05 2000-06-14 16:22:25.8211  CLAR     Clarify Requested for VER-9
7125 ZXATLY0000655E  05 2000-06-14 16:22:26.0611  C475    CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0000655E  05 2000-06-14 16:22:26.0614  C475    865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0000655E  05 2000-06-14 16:25:13.5131  ERR  1000 BI1 OF N INCORRECT PLS VER. RPON ZXATLY0000655D. GGOLAR X1753.
7125 ZXATLY0000655E  05 2000-06-14 16:25:25.4579  CLAR     Clarify Requested for VER-9
7125 ZXATLY0000655E  05 2000-06-14 16:25:25.5477  C475    CLARIFICATIONS RETURNED- 1000
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7125 ZXATLY0000655E 05 2000-06-14 16:25:25.5675 C475   865 ISSUED RETURN-FEED # 0002 CLARIFICATION REQUESTED
7125 ZXATLY0000655E 06 2000-06-15 08:30:39.1761 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0000655E 06 2000-06-15 08:30:39.6957 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000655E 06 2000-06-15 08:30:48.2168 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000655E 06 2000-06-15 08:30:48.2497 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000655E 06 2000-06-15 08:30:48.2500 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000655E 06 2000-06-19 05:17:08.8586 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0000655E 06 2000-06-19 05:17:08.9295 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0000655E 06 2000-06-19 05:30:05.1699 ISS    ORD COCDH639 06-26-00, SR D AARON X1760
7125 ZXATLY0000655E 06 2000-06-19 05:56:14.2181 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000655E 06 2000-06-19 05:56:14.5758 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000655E 06 2000-06-19 05:56:20.5230 C280   PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000655E 06 2000-06-24 13:26:39.4413 C280   PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000655E 06 2000-06-24 13:26:40.5180 C475   POS ISSUED, SOCS STATUS - PD      PENDING ORDER
7125 ZXATLY0000655E 07 2000-06-26 10:15:20.7440 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0000655E 07 2000-06-26 10:15:21.2961 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000655E 07 2000-06-26 10:16:12.5066 ERR 7465 CANNOT CANCEL ORDER
7125 ZXATLY0000655E 07 2000-06-26 10:16:12.5481 C380   REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXATLY0000655E 07 2000-06-26 10:16:12.7018 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000655E 07 2000-06-26 10:16:12.7021 C380   ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXATLY0000655E 07 2000-06-26 10:16:13.5132 C475   865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXATLY0000655E 07 2000-06-26 10:34:17.8669 CLM    LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0000655E 07 2000-06-26 10:34:17.8726 CLM    LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0000655E 07 2000-06-26 10:34:54.4108 :      CANCELLED ORDER COCDH639 PER SUP1 REQUEST ON VERSION 07 RECVD 06-26-00 RW X 1745
7125 ZXATLY0000655E 07 2000-06-26 10:56:25.8900 C280   CANCELLED ORDER COCDH639 RECEIVED FROM SOCS
7125 ZXATLY0000655E 07 2000-06-26 10:56:26.0103 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000655E 07 2000-06-26 10:56:26.2230 C475   865 ISSUED RETURN-FEED # 0002 FOC SENT
7125 ZXATLY0000825A 10 2000-06-12 15:56:26.9125 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000825A 10 2000-06-12 15:56:27.1786 C475   865 ISSUED RETURN-FEED # 0003 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000825A 11 2000-06-13 08:45:18.5506 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0000825A 11 2000-06-13 08:45:18.8661 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000825A 11 2000-06-13 09:36:08.6762 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0000825A 11 2000-06-13 09:36:08.7790 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000825A 11 2000-06-13 09:36:08.8404 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0000825A 11 2000-06-14 08:40:22.3286 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000825A 11 2000-06-14 08:40:22.3302 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0000825A 11 2000-06-14 08:56:37.5524 C280   CANCELLED ORDER CO83RHG9 RECEIVED FROM SOCS
7125 ZXATLY0000825A 11 2000-06-14 08:56:37.6925 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000825A 11 2000-06-14 08:56:38.0401 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000918  06 2000-06-02 08:00:23.9138 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0000918  06 2000-06-02 08:00:24.5655 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0000918  06 2000-06-02 08:01:06.3887 ERR 7465 CANNOT CANCEL ORDER
7125 ZXATLY0000918  06 2000-06-02 08:01:06.4397 C380   REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXATLY0000918  06 2000-06-02 08:01:06.4506 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0000918  06 2000-06-02 08:01:06.4509 C380   ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXATLY0000918  06 2000-06-02 08:01:06.6031 C475   865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXATLY0000918  06 2000-06-02 08:11:25.8283 SGNT   DB02C280 DELETED FROM TSIGNOUT
7125 ZXATLY0000918  06 2000-06-02 08:11:25.9343 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000918  06 2000-06-02 08:11:26.1812 C475   865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000918  06 2000-06-03 13:56:20.1813 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000918  06 2000-06-03 13:56:20.5965 C475   865 ISSUED RETURN-FEED # 0003 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000918  06 2000-06-06 10:00:49.6294 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000918  06 2000-06-06 10:00:49.9838 C475   865 ISSUED RETURN-FEED # 0004 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000918  06 2000-06-06 10:05:01.3586 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000918  06 2000-06-06 10:05:01.4320 C475   865 ISSUED RETURN-FEED # 0005 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000918  06 2000-06-20 07:26:24.5056 C280   PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000921  03 2000-06-15 01:01:54.3033 CANC   Cancelled By System
7125 ZXATLY0000924B 03 2000-06-03 10:16:58.3178 CLM    Lsr Claimed By CUID - YHBWLMP
7125 ZXATLY0000924B 03 2000-06-03 10:26:22.9016 C280   CANCELLED ORDER CO8P1H90 RECEIVED FROM SOCS
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7125 ZXATLY0000924B  03 2000-06-03 10:26:22.9618 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000924B  03 2000-06-03 10:26:23.1581 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000977   05 2000-06-01 16:02:08.8080 CLM    LSR CLAIMED BY CUID - BLWNCLZ
7125 ZXATLY0000977   05 2000-06-01 16:02:08.8629 CLM    LSR CLAIMED BY CUID - BLWNCLZ
7125 ZXATLY0000977   05 2000-06-01 16:06:27.4256 ISS    DDD CHG TO 6-15-00 THE ORDER NUMBER IS CO86VBG1. JA EXT 1964
7125 ZXATLY0000977   05 2000-06-01 16:26:50.4501 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0000977   05 2000-06-01 16:26:50.7732 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0000977   05 2000-06-01 16:27:06.7255 C280   PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0000977   05 2000-06-15 14:41:59.3563 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000977   05 2000-06-15 14:41:59.6249 C475   865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0000977   05 2000-06-16 15:41:47.5562 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0000977   05 2000-06-16 15:41:47.7225 C475   865 ISSUED RETURN-FEED # 0003 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0001045   04 2000-06-02 10:30:04.0897 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001045   04 2000-06-02 10:30:05.0005 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001045   04 2000-06-02 10:30:38.8090 ERR  7465  CANNOT CANCEL ORDER
7125 ZXATLY0001045   04 2000-06-02 10:30:38.8562 C380   REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXATLY0001045   04 2000-06-02 10:30:38.8599 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001045   04 2000-06-02 10:30:38.8618 C380   ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXATLY0001045   04 2000-06-02 10:30:39.3149 C475   865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXATLY0001045   04 2000-06-05 13:27:31.4416 SGNT   DB02C280 DELETED FROM TSIGNOUT
7125 ZXATLY0001045   04 2000-06-05 13:27:31.5224 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0001045   04 2000-06-05 13:27:31.7740 C475   865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0001045   04 2000-06-22 13:29:51.7179        ORDER CANCELLED PER SUP 1 REQUEST ORDER CO7W1NK7 WAS IN MA STATUS RW X 1745
7125 ZXATLY0001045   04 2000-06-22 14:50:24.6958 C240   LSR PROC STATUS BACK TO F CUID - PKYQHYK
7125 ZXATLY0001045   04 2000-06-22 15:52:40.2884 C280   PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0001063   03 2000-06-07 15:00:10.2031 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001063   03 2000-06-07 15:00:10.8670 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001063   03 2000-06-07 15:01:26.4210 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001063   03 2000-06-07 15:01:26.4846 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001063   03 2000-06-07 15:01:26.4867 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001063   03 2000-06-09 15:55:35.6591 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001063   03 2000-06-09 15:55:35.6893 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001063   03 2000-06-09 16:56:39.7091 ISS    ORD CO4KXM18 DD 06-23-00, SR D AARON X1760
7125 ZXATLY0001063   03 2000-06-09 16:12:51.3111 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001063   03 2000-06-09 16:12:51.5518 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001063   03 2000-06-09 16:12:56.4995 C280   PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0001063   04 2000-06-12 14:30:04.5134 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001063   04 2000-06-12 14:30:05.1487 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001063   04 2000-06-12 14:30:19.8766 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001063   04 2000-06-12 14:30:19.9413 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001063   04 2000-06-12 14:30:19.9741 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001063   04 2000-06-14 09:18:15.8928 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001063   04 2000-06-14 09:18:16.0591 CLM    LSR CLAIMED BY CUID - YHBWLMP
7125 ZXATLY0001063   04 2000-06-14 09:25:46.8584 ERR  1000  INVALID TOS, SR D AARON X1760
7125 ZXATLY0001063   04 2000-06-14 09:25:50.5656 CLAR   Clarify Requested for VER-9
7125 ZXATLY0001063   04 2000-06-14 09:25:50.9235 C475   CLARIFICATIONS RETURNED-  1000
7125 ZXATLY0001063   04 2000-06-14 09:25:50.9239 C475   865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0001063   04 2000-06-14 09:41:38.0068 C280   CO4KXM18:#ATTEMPTS=00 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZXATLY0001063   04 2000-06-14 09:41:44.3964 C280   CO4KXM18:#ATTEMPTS=00 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZXATLY0001063   04 2000-06-14 09:41:57.2954 C280   CANCEL SVC ORD BYPASSED, SUPP NOT = "01"
7125 ZXATLY0001063   04 2000-06-14 10:11:16.9409 C280   CO4KXM18:#ATTEMPTS=01 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZXATLY0001063   04 2000-06-14 10:11:17.6379 C280   CO4KXM18:#ATTEMPTS=01 & ATTEMPTED TO FOC, PON IN RECYCLE
7125 ZXATLY0001063   04 2000-06-14 10:41:16.6032 C280   CO4KXM18:FOC BUILD AND HOLD REQUESTED
7125 ZXATLY0001063   04 2000-06-14 10:41:17.0700 C475   865 ISSUED RETURN-FEED # 0002 FOC BUILT NOT SENT
7125 ZXATLY0001063   04 2000-06-14 10:41:17.2472 C280   CO4KXM18:FOC BUILD AND HOLD REQUESTED
7125 ZXATLY0001063   04 2000-06-14 10:41:17.3028 C475   865 ISSUED RETURN-FEED # 0003 FOC BUILT NOT SENT
7125 ZXATLY0001063   05 2000-06-14 11:51:32.8736 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001063   05 2000-06-14 11:51:33.2461 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001063   05 2000-06-14 11:52:39.1631 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
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7125 ZXATLY0001190  02 2000-06-12 15:45:40.7662 C380   MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125 ZXATLY0001190  02 2000-06-12 15:45:40.8371 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001190  02 2000-06-12 15:45:40.8398 C380   LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125 ZXATLY0001190  02 2000-06-14 08:23:50.4337 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0001190  02 2000-06-14 08:23:50.4926 CLM    LSR CLAIMED BY CUID - LZBKNZG
7125 ZXATLY0001190  02 2000-06-14 08:41:39.6651 C280   CANCELLED ORDER CO6NFJ7 RECEIVED FROM SOCS
7125 ZXATLY0001190  02 2000-06-14 08:41:39.7795 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001190  02 2000-06-14 08:41:40.2698 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001261  00 2000-06-12 16:01:18.2418 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  00 2000-06-12 16:01:20.6594 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  00 2000-06-13 05:15:04.8221 C510   LSR RESENT - NO RESPONSE FROM BSOG/LESOG
7125 ZXATLY0001261  00 2000-06-13 05:15:12.5294 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  00 2000-06-13 05:17:30.9236 ERR  7935 RSAG-SIMILAR STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP
7125 ZXATLY0001261  00 2000-06-13 05:17:31.1264 C380   "AUTO CLARIFICATION" PLACED BY LESOG
7125 ZXATLY0001261  00 2000-06-13 05:17:31.6501 C475   CLARIFICATIONS RETURNED- G7935
7125 ZXATLY0001261  00 2000-06-13 05:17:31.6983 C475   855 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0001261  02 2000-06-13 08:15:04.9322 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  02 2000-06-13 08:15:05.5649 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  02 2000-06-13 08:16:37.0194 ERR  7935 RSAG-SIMILAR STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP
7125 ZXATLY0001261  02 2000-06-13 08:16:37.3298 C380   "AUTO CLARIFICATION" PLACED BY LESOG
7125 ZXATLY0001261  02 2000-06-13 08:16:38.4535 C475   CLARIFICATIONS RETURNED- G7935
7125 ZXATLY0001261  02 2000-06-13 08:16:38.4639 C475   865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED

7125 ZXATLY0001261  03 2000-06-13 10:30:23.6871 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  03 2000-06-13 10:30:24.0961 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  03 2000-06-13 10:31:36.0465 ERR  7755 UNE - NPANXX NOT FOUND IN CLLI TABLE
7125 ZXATLY0001261  03 2000-06-13 10:31:36.1682 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001261  03 2000-06-13 10:31:36.1949 C380   LSR IN "ERROR" STATUS PLACED BY LESOG
7125 ZXATLY0001261  03 2000-06-15 08:43:45.8142 SGNT   DB02C240 UPDATED TSIGNOUT
7125 ZXATLY0001261  03 2000-06-15 08:43:45.8146 ERR  1000 BI1 FIELD INVALID, SR D AARONN X1760
7125 ZXATLY0001261  03 2000-06-15 08:43:48.2089 CLAR   Clarify Requested for VER-9
7125 ZXATLY0001261  03 2000-06-15 08:43:48.2618 SGNT   DB02C240 DELETED FROM TSIGNOUT
7125 ZXATLY0001261  03 2000-06-15 08:43:48.6528 C475   CLARIFICATIONS RETURNED- 1000
7125 ZXATLY0001261  03 2000-06-15 08:43:48.6532 C475   865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125 ZXATLY0001261  04 2000-06-15 11:00:41.8791 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  04 2000-06-15 11:00:42.1477 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  04 2000-06-15 11:03:20.9914 ERR  7755 UNE - NPANXX NOT FOUND IN CLLI TABLE
7125 ZXATLY0001261  04 2000-06-15 11:03:21.2226 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001261  04 2000-06-15 11:03:21.2255 C380   LSR IN "ERROR" STATUS PLACED BY LESOG
7125 ZXATLY0001261  04 2000-06-19 10:27:45.5567 NOTE   LSR CLAIMED BY PKYQHYK
7125 ZXATLY0001261  04 2000-06-19 10:28:58.8264 ISS    ISS CO16VTW6 DUE 06-26-00 CKKT 38.LYFU.646830..SB. PTPM1 X 613 FOR KIMBERLY MESSNE- ROBIN X 1745
7125 ZXATLY0001261  04 2000-06-21 13:00:42.4862 C280   8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125 ZXATLY0001261  04 2000-06-21 13:00:42.8109 C475   865 ISSUED RETURN-FEED # 0001 FOC SENT
7125 ZXATLY0001261  04 2000-06-21 13:02:09.7171 C280   PREVIOUS FOC HAS BEEN SENT,  NO ACTION TAKEN.
7125 ZXATLY0001261  04 2000-06-26 15:11:41.1720 C280   8#5 JEOPARDY STAGED FOR LSR, LEO STATUS CHANGED TO "J"
7125 ZXATLY0001261  04 2000-06-26 15:11:41.5444 C475   865 ISSUED RETURN-FEED # 0002 JEOPARDY NOTIFICATION SENT
7125 ZXATLY0001261  05 2000-06-26 16:15:06.7539 CB18   LSR LOADED AS MECHANIZED
7125 ZXATLY0001261  05 2000-06-26 16:15:08.4151 C865   LSR HAS BEEN SENT TO LESOG
7125 ZXATLY0001261  05 2000-06-26 16:15:39.8182 ERR  7465 CANNOT CANCEL ORDER
7125 ZXATLY0001261  05 2000-06-26 16:15:39.8596 C380   REQUEST TO BUILD DUMMY FOC SENT TO C475
7125 ZXATLY0001261  05 2000-06-26 16:15:39.9573 SGNT   DB02C380 INSERTED TO TSIGNOUT
7125 ZXATLY0001261  05 2000-06-26 16:15:39.9676 C380   ERROR WITH PENDING ORDER PLACED BY LESOG
7125 ZXATLY0001261  05 2000-06-26 16:15:40.2797 C475   865 ISSUED RETURN-FEED # 0001 FOC BUILT AND HELD FOR CANCEL
7125 ZXATLY0001261  05 2000-06-27 16:56:31.6372 CLM    LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0001261  05 2000-06-27 16:56:31.6387 CLM    LSR CLAIMED BY CUID - PKYQHYK
7125 ZXATLY0001261  05 2000-06-27 16:57:30.1349        CANCELLED ORDER CO16VTW6 IN MA STATUS RW X 1745
7125 ZXATLY0001261  05 2000-06-27 16:58:45.9297 NOTE   CANCELLED ORDER PER SUP1 REQUEST RW X 1745
```

7125	ZXATLY0001261	05	2000-08-27 17:13:22:2101	C280	CANCELLED ORDER COI8VTWE RECEIVED FROM SOCS
7125	ZXATLY0001261	05	2000-08-27 17:13:22:2748	C280	865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001261	05	2000-08-27 17:13:22:9335	C475	865 ISSUED RETURN-FEED # 0002 FOC SENT
7125	ZXATLY0001267	00	2000-08-20 10:45:05:5692	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001267	00	2000-08-20 10:45:06:5758	C865	LSR HAS BEEN SENT TO LESOG
7125	ZXATLY0001267	00	2000-08-20 20:05:45:4091	C280	MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125	ZXATLY0001267	00	2000-08-20 20:05:45:7510	SGNT	D802C280 INSERTED TO TSIGNOUT
7125	ZXATLY0001267	00	2000-08-20 20:05:45:7941	C280	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001267	00	2000-08-22 05:57:15:1538	CLM	LSR CLAIMED BY CUID - YHBMLMP
7125	ZXATLY0001267	00	2000-08-22 05:57:15:1907	CLM	LSR CLAIMED BY CUID - YHBMLMP
7125	ZXATLY0001267	00	2000-08-22 05:57:43:6427	ERR	1000 RPON MISSING, SR D AARON X1760
7125	ZXATLY0001267	00	2000-08-22 05:57:45:9837	CLAR	Clarify Requested for VER-9
7125	ZXATLY0001267	00	2000-08-22 05:57:46:3227	C475	CLARIFICATIONS RETURNED- 1000
7125	ZXATLY0001267	00	2000-08-22 05:57:46:3231	C475	855 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125	ZXATLY0001267	02	2000-08-22 16:30:34:0065	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001267	02	2000-08-22 16:30:35:8278	C865	LSR HAS BEEN SENT TO LESOG
7125	ZXATLY0001267	02	2000-08-22 21:01:44:7751	C380	MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125	ZXATLY0001267	02	2000-08-22 21:01:45:0029	SGNT	D802C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001267	02	2000-08-22 21:01:45:0911	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001267	02	2000-08-23 16:56:08:3173	CLM	LSR CLAIMED BY CUID - YHBMLMP
7125	ZXATLY0001267	02	2000-08-23 16:56:08:3212	CLM	LSR CLAIMED BY CUID - YHBMLMP
7125	ZXATLY0001267	02	2000-08-23 16:58:50:2553	ERR	1000 RPON MISSING ARE TYPED INCORRECTLY, SR D AARON X1760
7125	ZXATLY0001267	02	2000-08-23 16:58:55:3391	CLAR	Clarify Requested for VER-9
7125	ZXATLY0001267	02	2000-08-23 16:58:55:7459	C475	CLARIFICATIONS RETURNED- 1000
7125	ZXATLY0001267	02	2000-08-23 16:58:55:7463	C475	865 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED
7125	ZXATLY0001267	02	2000-08-26 12:00:24:1641	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001267	03	2000-08-26 12:00:24:4498	C865	LSR HAS BEEN SENT TO LESOG
7125	ZXATLY0001267	03	2000-08-26 12:01:11:2478	C380	MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125	ZXATLY0001267	03	2000-08-26 12:01:11:2636	SGNT	D802C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001267	03	2000-08-26 12:01:11:2713	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001267	03	2000-08-28 11:40:17:7764	CLM	LSR CLAIMED BY CUID - YHBMLMP
7125	ZXATLY0001267	03	2000-08-28 11:40:17:8205	CLM	LSR CLAIMED BY CUID - YHBMLMP
7125	ZXATLY0001267	03	2000-08-28 11:40:54:1991	ISS	ORD C018VW26 DD 07-07-00, SR D AARON X1760
7125	ZXATLY0001267	03	2000-08-28 12:11:23:4246	C280	865 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
7125	ZXATLY0001267	03	2000-08-28 12:11:23:7679	C475	865 ISSUED RETURN-FEED # 0001 FOC SENT
7125	ZXATLY0001267	03	2000-08-29 16:42:12:7591	C280	PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN
7125	ZXATLY0001267	03	2000-08-29 16:42:29:2571	C475	FOS ISSUED, SOCS STATUS - PD PENDING ORDER
7125	ZXATLY0001362	00	2000-08-22 09:42:22:3940	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001362	00	2000-08-22 09:43:23:6378	C865	LSR HAS BEEN SENT TO LESOG
7125	ZXATLY0001362	00	2000-08-22 09:47:02:0335	C380	MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125	ZXATLY0001362	00	2000-08-22 09:47:02:2048	SGNT	D802C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001362	00	2000-08-22 09:47:02:2123	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001362	00	2000-08-23 06:34:30:2329	CLM	LSR CLAIMED BY CUID - BLWNCLZ
7125	ZXATLY0001362	00	2000-08-23 06:34:30:2976	CLM	LSR CLAIMED BY CUID - BLWNCLZ
7125	ZXATLY0001362	00	2000-08-23 06:43:46:9468	ERR	1000 THE LSO AND 911S INCORRECT. JAMES EXT 1764
7125	ZXATLY0001362	00	2000-08-23 06:43:55:3356	CLAR	Clarify Requested for VER-9
7125	ZXATLY0001362	00	2000-08-23 06:43:55:8079	C475	CLARIFICATIONS RETURNED- 1000
7125	ZXATLY0001362	00	2000-08-23 06:43:55:8082	C475	855 ISSUED RETURN-FEED # 0002 CLARIFICATION REQUESTED
7125	ZXATLY0001362	02	2000-08-23 16:15:04:6310	CB18	LSR LOADED AS MECHANIZED
7125	ZXATLY0001362	02	2000-08-23 16:15:04:9898	C865	LSR HAS BEEN SENT TO LESOG
7125	ZXATLY0001362	02	2000-08-23 17:22:31:0640	C380	MANUALP-LSR INVOLVED IN PROJECT OR HAS RPON
7125	ZXATLY0001362	02	2000-08-23 17:22:31:1723	SGNT	D802C380 INSERTED TO TSIGNOUT
7125	ZXATLY0001362	02	2000-08-23 17:22:31:2554	C380	LSR IN "RECYCLE" PLACED STATUS BY LESOG
7125	ZXATLY0001362	02	2000-08-26 16:22:38:3506	CLM	LSR CLAIMED BY CUID - NRZQLNJ
7125	ZXATLY0001362	02	2000-08-26 16:22:38:3358	CLM	LSR CLAIMED BY CUID - NRZQLNJ
7125	ZXATLY0001362	02	2000-08-26 16:29:21:9426	CLAR	Clarify Requested for VER-9
7125	ZXATLY0001362	02	2000-08-28 16:29:22:0222	C475	CLARIFICATIONS RETURNED- 1000
7125	ZXATLY0001362	02	2000-08-28 16:29:22:0225	C475	855 ISSUED RETURN-FEED # 0001 CLARIFICATION REQUESTED

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Friday, October 20, 2000 12:43 PM
To: gpterry@att.com; bradbury@att.com; sharonnorris@att.com; eppsteiner@att.com; campbekj@att.com; belangda@att.com; smorrow@broadband.att.com; dobeck@broadband.att.com; crcannon@att.com; watersre@att.com; bcsturdevant@att.com; deberger@att.com; waldbads@att.com
Subject: FW: Order Backlog

Importance: High

> -----Original Message-----
> From: Williamson, Jill R, NCAM
> Sent: Friday, October 20, 2000 12:30 PM
> To: 'Jan M. Burriss'
> Cc: 'Sandra C. Jones'
> Subject: Order Backlog
> Importance: High
>
> Jan,
>
> I've received calls from several of our workcenters this week around an
> apparent backlog of orders at the LCSC. I spoke with Sandra earlier this
> week and found that the LCSC is backlogged due to the addition of the
> Broadband orders in the Atlanta LCSC.
>
> We have orders that were sent a week ago that have yet to receive a
> response. When we call the LCSC to get the orders turned around, they
> will only accept two PONs per call. Thus our workcenter must spend a
> great deal of time calling the LCSC just to get a response on the orders.
>
> I called Ron Moore today to request that he accept a list of the PONS to
> be worked instead of us calling back two PONS at a time (Broadband has 36
> orders backlogged). I'm waiting on Ron's response. Additionally, I don't
> understand why BellSouth is having this problem when it knew the volume of
> orders it would be transitioning from Birmingham to Atlanta. I'd
> appreciate your providing me with a plan to remedy the current backlog and
> BellSouth's plan to correct the issue going forward. I'd appreciate a
> response by close of business today.
>
> Sincerely,
>
> Jill Williamson
>

Docket No. 2000-465
JMB-37
Page 1 of 2

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Monday, November 06, 2000 12:58 PM
To: mlacy@att.com; bseigler@att.com; gpterry@att.com; eppsteiner@att.com; sharonnorris@att.com; bradbury@att.com; bobik@att.com; dreinig@att.com; deberger@att.com; watersre@att.com; dobeck@broadband.att.com; smorrow@broadband.att.com; waldbads@att.com; campbekj@att.com; crcannon@att.com
Subject: FW: LCSC backlog

-----Original Message-----
From: Jan.Flint@bridge.bellsouth.com
[mailto:Jan.Flint@bridge.bellsouth.com]
Sent: Friday, November 03, 2000 3:27 PM
To: Williamson, Jill R, NCAM
Cc: Jan.Burriss1@bridge.bellsouth.com;
Sandra.Jones5@bridge.bellsouth.com
Subject: LCSC backlog

Jill,

I wrote this on Monday and thought I sent it to you but I just found it in my
out box -- sorry.

I talked to Ron Moore today about the FOC backlog that AT&T has experienced in
the last two weeks.

Ron attributed the MediaOne fall-out and backlog to a directory listings problem in our LEO system. There was also a problem with inappropriate usage
of commas in MediaOne's LSRs that caused additional orders to fall-out for manual handling. The LCSC could not easily handle the large number of orders
that required manual handling.

This past week, order volume overwhelmed the center. After working this past Saturday, Ron feels that by close of business today they will have recovered and will be current on their pending LSRs.

To address the order volume issues, the LCSC will add 20 service reps to its staff on November 13th and will add another 20 in December.

I hope this information minimizes AT&T's concerns on recent FOC cycle-time.

Thanks,

Jan

Robert W Quinn, Jr.
Director - Federal Government Affairs

Suite 1000
1120 20th St , NW
Washington, DC 20036
202 457-3851
FAX 202 457-2545

EX PARTE OR LATE FILED

December 23, 1998

RECEIVED

DEC 23 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Ex parte - CC Docket No 98-121
Second Application of BellSouth Corporation, BellSouth Telecommunications, Inc , and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana

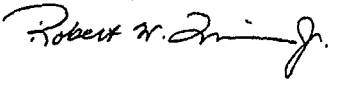
Dear Ms. Roman Salas:

Today, Steve Garavito, Al Lewis, Pam Nelson, Jay Bradbury, Jim Hill (via telephone) and I of AT&T, and I met with Michael Pryor, Jake Jennings, Andrea Kearney, Claudia Pabo and Claudia Fox of the Common Carrier Bureau, as well as representatives from BellSouth and MCI. At the request of Commission staff, AT&T reviewed its position of record in this proceeding with an emphasis on the need for a nondiscriminatory interface for maintenance and repair. AT&T reviewed the support for the position AT&T has taken in its filings in this docket using the enclosed materials In sum, AT&T reasserted the position that it today has two choices for repair and maintenance operations in BellSouth territory given BellSouth's interface options: 1) choose to use an interface that provides significantly less functionality than BellSouth's own retail representatives enjoy (ECTA), or 2) choose two interfaces to achieve the same functionality as BellSouth's retail representatives enjoy (TAFI). Under the second option, the new entrant faces the dual entry issues (increased errors and cost) previously identified by the Commission as the reason machine-to-machine interfaces are required for pre-ordering/ordering functions

No. of Copies rec'd 0+1
List A B C D E

Two copies of this Notice are being submitted to the Secretary of the Commission in accordance with Section 1.1206(b)(1) of the Commission's Rules.

Very truly yours,



Enclosures
cc: Mr. M. Pryor
Mr. J. Jennings
Ms. A. Kearney
Ms. Claudia Pabo
Ms. Claudia Fox
Ms. Karen Reidy (MCI)
Mr. Robert Blau (BellSouth)

Tab A

MAINTENANCE AND REPAIR INTERFACE REQUIREMENTS

AT&T Discussion Aids
for

Discussion Among FCC Staff, AT&T, MCI and BellSouth

December 23, 1998

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Q. Is it necessary to maintain your own database for trouble history given that same information is contained in BellSouth's databases which is accessible through TAFI?

- Yes. It is vital to view the maintenance and repair process from the correct perspective.

- The customer reporting a trouble is the CLEC's customer and the process being invoked is the CLEC's process, not BellSouth's.

- A customer's trouble must first be input to and satisfy the CLEC's process **before** it can transfer to BellSouth's process.

- AT&T's customer can be calling to report a trouble condition in one of six major product categories:
  - Local
  - Long Distance
  - Wireless
  - Video
  - Internet
  - Data

- Within Local AT&T's customers can be reporting troubles associated with services provided by a number of ILECs, CAPS, other vendors or even AT&T itself through:
  - Resale
  - Unbundled Network Elements
  - Facilities Based Interconnection

- Only the maintenance of trouble history within the CLEC's own database can allow the CLEC's business processes to function effectively and efficiently.

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Q. Absent a machine to machine interface for repair and maintenance, what specific information would your repair representative be required to enter into your own back office systems?

R. How much additional time would this take and is it necessary that an end user is on-line while such information is entered into your back office system?

- Once again it is vital to view the maintenance and repair process from the correct perspective.

- The customer reporting a trouble is the CLEC's customer and the process being invoked is the CLEC's process, not BellSouth's.

- A customer's trouble must first be input to and satisfy the CLEC's process **before** it can transfer to BellSouth's process.

- The end user is thus required to be on-line while information is entered into the CLEC's maintenance and repair system

- The end user is not required to be on-line during the dual entry process necessary to populate the repair ticket in BellSouth's TAFI system and transfer any information provided by the TAFI functionality back into the CLEC's system and process. The additional time necessary to complete this process is however part of the repair duration interval experienced by the CLEC's customer.

- A machine to machine interface would eliminate dual data entry and allow the useful TAFI functionality to be available to the CLEC with the customer still on-line.

- The information which has been input once into the CLEC's process and must be input a second time into BellSouth's TAFI includes the following: (for resale, and any arrangement utilizing a BellSouth UNE port, or a ported BellSouth line number)

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

- Telephone Number
  - Must also perform visual inspection to insure service address presented from LMOS matches that presented from CRIS and correct LMOS if it is in error.
- Line In Use Indicator
- Type of Trouble (a series of menus and sub-menus – see page 4)
- Reach Number
- Remarks Regarding the Reach Number if Necessary
- Access Numbers
- Referred By Name
- New Commitment (Appointment) Time
- Access Hours
- Out of Service / Affecting Service Indicator
- Customer Date and Time of Desired Commitment
- Notes
- Category Indicator – Customer Direct/Customer Excluded
- Irate Indicator
- Customer Comments
- Additional Narrative for LMOS
- Date and Time Received

- During the creation of the TAFI input the TAFI functionality may / will most likely provide useful information which must be input to the CLEC's system. Examples include:
  - Trouble Description Codes
  - Commitment Date Recommendations
  - Pending Service Order Information
  - Pending Trouble Report Information
  - Test Results

- Having created a TAFI trouble report the CLEC now owns that trouble report and must monitor its status and perform all necessary actions to close the TAFI trouble ticket when the trouble is resolved, and the duplicate trouble ticket in their own system.

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Type of Trouble
Main Menu

Dial Tone
Outgoing
Incoming
Transmission
Memory Call
Memory Services
Calling Plan / Billing
Long Distance
Physical
Data
Enhanced Services

} Individual Sub-Menus

Dial Tone
Sub-Menu

No Dial Tone
At Times No Dial Tone
Slow Dial Tone
Can't Break Dial Tone
Dial Tone After Dialing Number
Busy / Reorder / Recording Pickup

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Please provide and discuss any studies quantifying the additional costs imposed due to lack of integration for repair and maintenance functions.

- See Tab 11. In May and June of 1997 AT&T received training on TAFI and conducted a trial of the system comparing functionality and estimating the incremental cost of its use. Four methods of operation were considered.
  - TAFI as a stand alone process
  - TAFI in conjunction with AT&T's Actiview based process
  - AT&T's Standard Process – Actiview + phone call to BellSouth
  - Actiview with Electronic Bonding

- An **additional cost** of 2.4 agents per 100,000 access lines was identified as the penalty for dual entry to TAFI resulting from approximately 3 minutes additional agent work per trouble ticket.

- In contrast Electronic Bonding was estimated to yield a 15 to 19 minute **reduction** in agent work per trouble ticket.

- The additional cost of TAFI, the reduction in cost associated with EBI, and a number of other factors concerning the availability of data to support business unit and regulatory reporting requirements lead to the decision not to implement TAFI even as an interim process. This decision was communicated to BellSouth on July 21, 1997. See Tab 12.

MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

Q. Other than a machine to machine interface for repair and maintenance, are there any other methods to retrieve information necessary for your own back office system?

- Once again it is vital to view the maintenance and repair process from the correct perspective.

- The customer reporting a trouble is the CLEC's customer and the process being invoked is the CLEC's process, not BellSouth's.

- A customer's trouble must first be input to and satisfy the CLEC's process **before** it can transfer to BellSouth's process.

- In the absence of a machine to machine interface for maintenance and repair useful and mechanically retrievable information while the CLEC is in contact with its customer can only come from the CLEC's back office systems and databases.

- Information residing in BellSouth's legacy systems accessed by TAFI or used in the CLEC's other OSS processes is only available to the repair agent on a manual basis in a manner analogous to the predicament facing BellSouth's maintenance analyzers pre-TAFI.
  - The repair agent must know which supplemental system to use
  - The repair agent must possess the experience to analyze and use the information gathered
  - The repair agent must provide consistent resolutions and/or recommendations.

- Today's **EBI or ECTA** Interface is limited in scope and simply **delivers trouble tickets** electronically to BellSouth **for manual processing by BellSouth** in exactly the same manner described to AT&T by BellSouth in April 1996:
  - BellSouth Maintenance Administrators clear an average of 9 tickets an hour, while BellSouth Customer Service Analysts using TAFI clear as many as 17
  - TAFI clearing times are routinely less than 40 minutes, while LMOS clearing times are greater than double that of TAFI.
  - EBI/ECTA tickets may wait in the manual screening pool for a considerable period of time before being picked up.

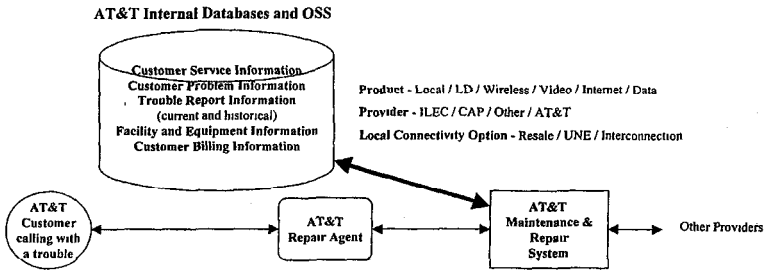
MACHINE TO MACHINE INTERFACES ARE REQUIRED FOR MAINTENANCE AND REPAIR

- Remember that the EBI process only allows you to:
  - Enter a report
  - Modify data on an existing report
  - Receive status messages during the life of the report
  - Someone at BellSouth still has to manually "screen" the report to figure out what to do to fix it (Gene Piatkowski, January 28, 1998)

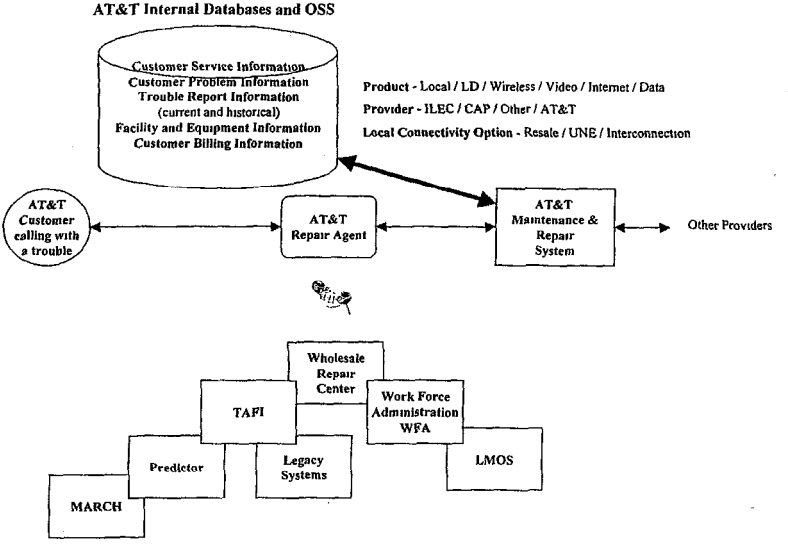
- EBI/ECTA without access to TAFI functionality is conceptually equivalent to non-integrated pre-ordering and electronic ordering without flow-through.

Tab B

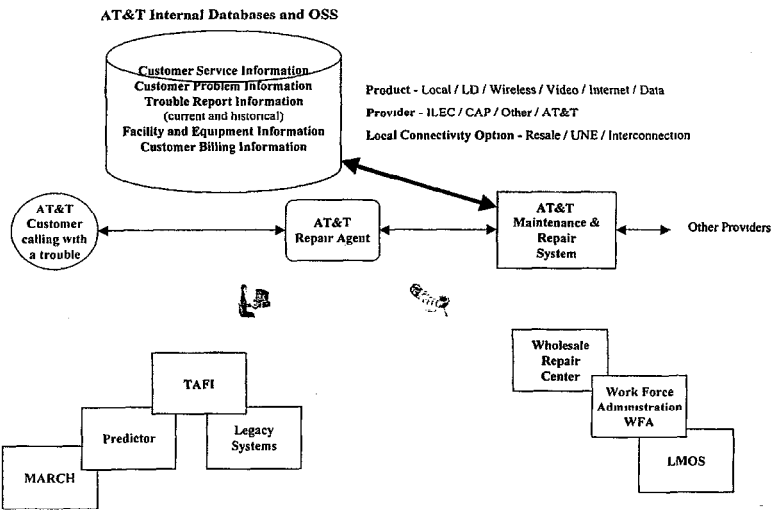
AT&T Maintenance Process



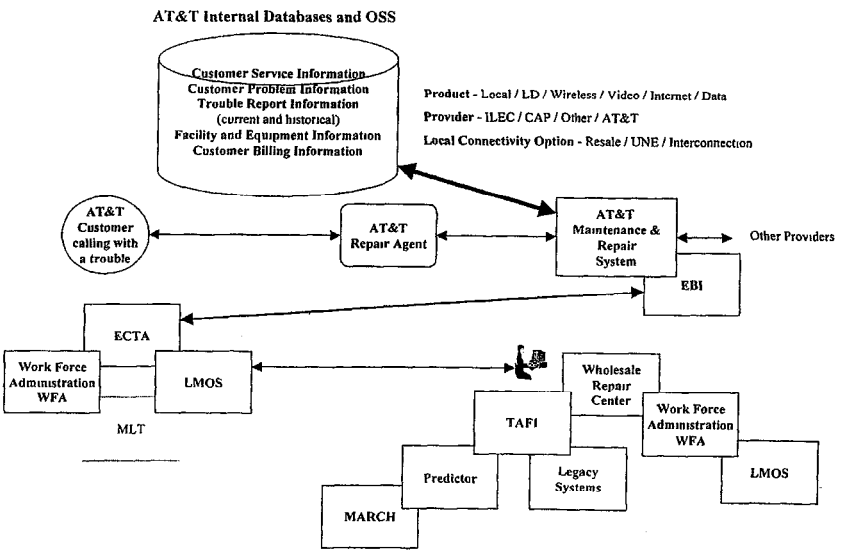
AT&T "Standard" Maintenance Process with BellSouth



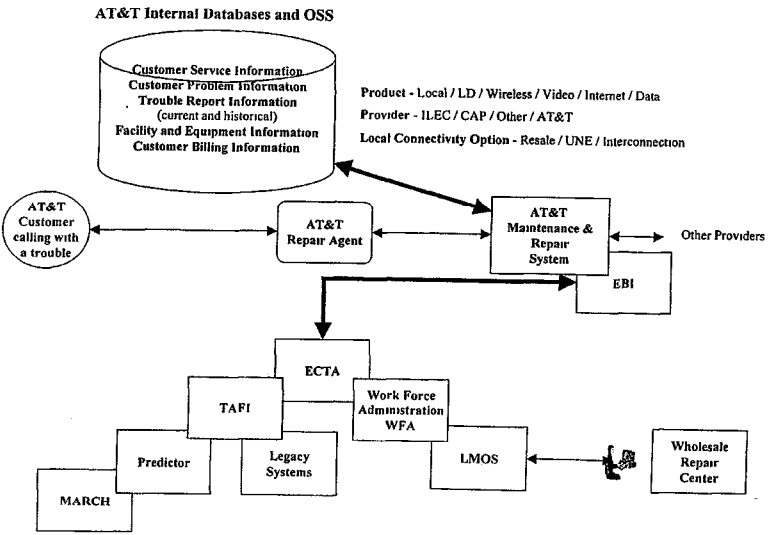
AT&T "Actiview + TAFI" Maintenance Process with BellSouth



AT&T "EBI/ECTA" Maintenance Process with BellSouth



A Machine to Machine Maintenance Process with BellSouth



Tab C-1

Electronic Bonding Interface (EBI, a.k.a. ECTA) Negotiation and Implementation Chronology

Dates	Activity
August 1995 – March 1996	Negotiations under Georgia Act – AT&T Requirements establish EBI as the goal with interim arrangements until full deployment BellSouth estimates availability of such an interface in 1Q96 will provide parity with BellSouth's maintenance and repair operations (Tab 1 and Tab 2, Items 1 B.1.a-e and 1 B 16-17)
December 21, 1995	AT&T files "Resale" Petition with GA PSC (Docket 6352-U)
April 1996	New BellSouth negotiators contradict claims of previous representatives, and explain the superior capabilities of TAFI AT&T requests EBI access to TAFI (April 29, 1996 letter) (Tab 3)
June 11, 1996	GA PSC Order in Docket 6352-U requires establishment of AT&T's requested electronic interfaces by July 15, 1996, and the submission of a joint status report within 30 days (Tab 4, Pages 11,12 and 16)
June 21, 1996	BellSouth files a unilateral report with the GA PSC Cites availability of existing Inter-Exchange Carrier EBI and reports investigation of TAFI reveals that TAFI via EBI could be provided in 1997 at a cost of $3 million (Tab 5, Pages 14-15)
July 11, 1996	GA PSC Order in Docket 6352-U supplements the Electronic Interface portions of its June 11, 1996 Order BellSouth directed to provide the technical specifications for TAFI via EBI by August 31, 1996, and complete implementation by March 31, 1997 (Tab 6, Page 5)
August 9, 1996	BellSouth's Technology Specification included in the August Surveillance Report to the GA PSC describes a web server based interactive direct trouble report entry system rather than TAFI via EBI This proposal is never implemented (Tab 7, pages 18-21)
August 12, 1996	Mrs. Gloria Calhoun files testimony in FPSC Docket 960833-TP describing the work BellSouth will be doing at AT&T's request to add to the existing electronic trouble reporting interface (EBI) "the capability for the ALEC to access the same interactive testing sequence that BellSouth follows to screen trouble reports " (TAFI), by March of 1997 at a cost of $3 5 million (Tab 8, Beginning at Page 43, Line 18)

Dates	Activity
3Q 1996 / 1Q 1997	Negotiation dialogues continue BellSouth never produces a specification for TAFI, TAFI functionality via EBI, or EBI for Local Services per the T1M1 Standard In October, AT&T provides BellSouth with our specifications reflecting EBI for Local Services per the T1M1 Standard BellSouth ultimately agrees to begin implementation planning under AT&T's specifications, including the provisioning of a portion of the MLT testing functionality available through TAFI, the initial meeting is held February 26/27, 1997
4Q 1996 / 1Q 1997	Interconnection Agreement negotiations result in agreement to and approval of Attachment 15, "Interface Requirements for Ordering and Provisioning, Maintenance and Repair and Pre-Ordering " All interfaces under this agreement are to be machine-to-machine (Section 4 6) and the interface for Maintenance and Repair is described as EBI (Section 6 2)
March 31, 1997	BellSouth allows direct access to CLEC TAFI (Tab 9)
April 1997	FCC Two Day Forum on 271 Issues Mrs Calhoun responds to Mr Bradbury's question as to if and when BellSouth will provide access to TAFI functionality via EBI by stating that such a capability would be a "violation" of the standard
May 1997	BellSouth commits to implementation of EBI for Local Services per the T1M1 Standards and other requirements provided in AT&T's specifications with testing to begin in October of 1997 Provisioning of full MLT access (and other TAFI functionality) is deferred to "an enhancement in early 1998" (Tab 10, Page 3)
June 1997	AT&T evaluates TAFI as a possible interim interface Additional cost of 2 4 agents per 100,000 access lines is determined to add TAFI to existing process for dual data entry This cost and other considerations (pending availability of EBI, business and regulatory reporting requirements) result in a decision not to utilize TAFI (Tab 11, Tab 12)
3Q 1997 – 1Q 1998	EBI implementation activities continue Both parties encounter delays in the development and testing processes Turn-up in a production mode occurs in February 1998

Dates	Activity
March 1998	Mr William Stacy testifies that "AT&T's request recognizes that TAFI is superior to the national standard EBI interface, and that adding TAFI's functionality to EBI is a goal worth pursuing, and I agree " (Tab 13, Direct Testimony Page 40, Line 19-21 and Transcript Page 192-3)
March 18, 1998 – April 3, 1998	AT&T evaluates EBI a.k a ECTA System performance resulted in resource savings per trouble ticket AT&T makes determination to suspend further implementation and development until the number of local customers makes utilization of this interface cost-effective BellSouth is notified on April 9, 1998 (Tab 14)

Tab C-2

DRAFT - Version 2

Book 19 / Tab 2

AT&T Communications, Inc.
Loop Unbundled w/Interconnection Planning Document
for
Network Services, Network Operations, Billing and CARE,
and Pricing and Compensation
in the
Local Exchange Service Marketplace

I. Network Operations

In a Loop Unbundled Resale environment, AT&T will be providing it's own switching and a portion of the local facilities will belong to AT&T. It is AT&T's goal to have a working Electronic Bonding Interface (EBI) available and to bond with as many suppliers as is practical. This form of electronic communication will facilitate the Service Ordering, Provisioning and Maintenance processes.

A real time ordering and provisioning interface using electronic bonding is essential to provide AT&T operational parity with existing BellSouth customer ordering processes. Such an interface is also required for BellSouth to comply with existing legislation and regulatory rules in many states.

The requirements of Local Number Porbability place a unique challenge on the Service Ordering and Provisioning processes. These requirements, while not completely determined as yet, are refered to within the framework of this agreement. Addressing a process that is not yet completely established is always dangerous due to the possibility that some key component may be omitted. AT&T requests that BellSouth keep this in mind when reading the sections of this document which relate to Local Number Portability, and be flexible in responding to those sections.

In the interim, the use of Remote Call Forwarding (RCF) as a means of limited geographic portability has been proposed. AT&T realizes that there are some drawbacks inherent in the use of RCF for this purpose and that some feature functionality can be lost. However, when a Customer changes local carriers and wants to retain their existing local telephone number a solution must be offered.

As a Service Provider, AT&T recognizes the value of servicing our products quickly and how important it is to assure our Customers that the problem will be fixed the first time. Any product or service which carries the AT&T brand must meet AT&T's requirements for prompt, friendly and efficient Customer service. To that end this section of the agreement deals with Maintenance in a Loop Unbundled Resale environment.

It is our intention to provide AT&T Customers with a single telephone number which they can call 24 hours a day, 7 days a week for the repair of their service. Logistically this presents some challenges to the current arrangement they may have with their local service. It is AT&T's desire that these challenges be transparent to the AT&T end-user and that BellSouth and AT&T work out any problems in the "Front End" process.

As with the Service Ordering and Provisioning process, AT&T would like to migrate to a standard EBI interface between the two companies. However, since BellSouth may not be ready to migrate to this platform in the time frame required we may need to establish an interim agreement which is based on some type of workable electronic interface.

I. Network Operations (Cont'd)

If a full EBI interface is not available, we will need to develop an interim solution. One potential would be for BellSouth to provide a direct interface into the current BellSouth trouble reporting and tracking system which could be accessed from AT&T's work center. Another option could entail a gateway interface. BellSouth could provide AT&T with the interface specifications and AT&T could potentially build a gateway between its existing trouble ticketing system and the BellSouth system. These are just two possible methods of operation, AT&T is more than willing to discuss any viable options presented by BellSouth in response to this Loop Unbundled Resale agreement.

In addition to an electronic interface required to provide "real time" status to AT&T's end-users the use of the AT&T brand is especially important. To that end, AT&T would like to discuss the options for the repair service in connection with provisioning and repairing service to AT&T end-users. It is understood that this is a very sensitive issue and we are willing to work with BellSouth to meet this requirement

B. Maintenance Procedures

1. BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process for Business and Residential (switched and special services):

a. Trouble Ticket entry and update capabilities
b. Review and verify test results
c. Provide status updates on current "Open" Trouble Tickets
d. Verify feature and function updates and corrections as they relate to an open Trouble Report
e. Provide a means for Network Surveillance (Performance Monitoring)
f. Provide dispatch status as well as location and ETA.

2. Provide AT&T the ability to verify and acknowledge any scheduled appointment upon receipt of the Trouble Ticket for dispatch out and customer premises when applicable.

3. BellSouth will meet the following status requirements on AT&T services:

a. Immediate notification of any changes in trouble status, electronically
b. The ability to retrieve the current status of any open trouble report
c. Immediate notification when any scheduled appointment is in jeopardy

4. BellSouth will close all TOK (Test OK), NTF (No Trouble Found), and CC (Came Clear) trouble reports.

5. BellSouth will close the trouble by contacting the AT&T work center, AT&T in turn will be responsible for contacting the end-user customer.

6. BellSouth will notify AT&T immediately of any potential Network event that could have an impact on AT&T Customer's service performance. This includes any situation where AT&T leased elements are functioning on back up or emergency power.

7. BellSouth will provide AT&T with prior notification with the option for rescheduling, of any scheduled maintenance activity which has an impact on an AT&T Customer's service.

8. BellSouth technicians will clear any reported trouble to the established network interface.

9. AT&T requires the ability to test all facilities including the SLC.

I. Network Operations (Cont'd)

B. Maintenance Procedure (Cont'd)

10. BellSouth will report all associated maintenance and service charges at the time the trouble ticket is closed with the AT&T service center.

11. BellSouth and AT&T will negotiate a mutually acceptable escalation and expedite procedure for all services provided by BellSouth under this agreement.

12. BellSouth and AT&T will agree to a trouble priority and process for all trouble reports handled between the two companies.

13. AT&T and BellSouth will negotiate mutually acceptable performance metrics which will apply to the network elements which AT&T leases from BellSouth.

14. BellSouth will provide AT&T with the ability to "pre-screen" any activities which would incur charges to AT&T in order for AT&T to validate the activity. This includes, but is not limited to the dispatch of field forces to an AT&T end-users premises.

15. AT&T requires an established Disaster Recovery plan with BellSouth.

16. BellSouth will provide the AT&T work center with "real time" test results on any AT&T end user service.

17. BellSouth agrees to route repair service calls to the correct service provider (AT&T), with same dialing parity as BellSouth.

18. BellSouth will bill any applicable Time and Materials charges to AT&T, not to the end user.

19. BellSouth agrees to provide a listing of all applicable charges at the time the Touble Ticket is closed.

20. BellSouth and AT&T agree to discuss the contracting of BellSouth technicians to perform work on AT&T end-user Customer's premises representing AT&T. This includes but is not limited to:

a. Providing the contracted technicians with AT&T forms for the end-user
b. Providing the contracted technicians with "branded" AT&T "Not at Home" cards
c. Providing the contracted technicians with AT&T business cards
d. Assuring that the technicians are trained in a non-discriminatory fashion

Tab C-3

Network Operations — **Total Issues in Category: 61**

Service Ordering and Provisioning

1.A.1

Issue Status: Pending ◄—BellSouth—► / Escalated ◄—AT&T—►
Contacts: Welch & Higdon
Class : OBF, OI, EC
Start 3/11/96
Finish 5/1/96

A Provide AT&T with real time electronic means to transfer order information from AT&T to BellSouth and vice-versa

B

C BellSouth Interim Plan

Long Term Plan
OBF; Electronic Communications solution being evaluated by BellSouth.

D
Action Item 1: *Evaluate EDI interface proposed by AT&T* — Contact: BST-Massey
Action Item 2: *Complete Business Case* — Contact: BST-Massey
Action Item 3 — Contact:
Action Item 4 — Contact:

E

1.A.2.a

Issue Status: Pending ◄—BellSouth—► / Escalated ◄—AT&T—►
Contacts: Higdon
Class : OBF, OI, EC
Start 3/11/96
Finish 5/1/96

A BellSouth will provide AT&T with a real time response for Firm Order Confirmation (FOC)

B

C BellSouth Interim Plan
BellSouth will return FOCs via daily FAX; This will be done periodically throughout the day. SmartFAX will enhance this process.

Long Term Plan
OBF; BellSouth is evaluating a Electronic Communications solution.

D
Action Item 1: *See 1.A 1* — Contact:
Action Item 2 — Contact:
Action Item 3 — Contact:
Action Item 4 — Contact:

E

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Maintenance Procedures

1.B.1.a

Issue Status: Pending ←BellSouth→ Obtainable ←AT&T→

Contacts: Raulerson

Class:

Start:

Finish

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process Trouble Ticket entry and update capabilities

B AT&T needs information on whether contact numbers provided in handbook are dialable from outside the state

C BellSouth Interim Plan

Interim: BellSouth will provide contact numbers for the appropriate end users centers, see reseller handbook Long Term: BellSouth is evaluating electronic bonding solutions for time & cost; resolution will require forecasts of volume and timing from AT&T.

Long Term Plan

D Action Item 1 — Contact:

BellSouth will denote which numbers are accessible outside of state (1/15/96)
BellSouth will determine how business repair calls are directed after dialing the 800 number

Action Item 2 — Contact:

Action Item 3 — Contact:

E

Action Item 4 — Contact:

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1.B.1.b

Issue Status: Pending / Escalated

Contacts: BellSouth ◄► Raulerson; AT&T ◄► Bradbury (Imperato)

Class :

Start:

Finish:

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process: Review and verify test results.

B AT&T wants to do their own testing based on customer inquiry On close out need disposition and cause codes (DMOQ Issue) AT&T will check on prescreening.

C BellSouth Interim Plan

BellSouth expects AT&T to adhere to its prescreening procedures on repair calls until such times as an electronic interface is established; estimated availability 1Q96.

D Action Item 1 — Contact:

This generally is dependent upon the electronic interface. In the interim,AT&T will incorporate BellSouth's prescreening guidelines in its scripts AT&T will provide scripts to BellSouth by 1/3/95 BellSouth will evaluate provision of disposition and cause codes by January meeting BellSouth will provide copy of FL order on out-of-service question. Need further discussion with EB SMES

Long Term Plan

Action Item 2 — Contact:

Action Item 3 — Contact:

E

Action Item 4 — Contact:

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A AT&T Initial Resale Expectation	B Clarified Expectation	C BellSouth Resale Plan	D Action Items

1.B.1.c

Issue Status		Contacts	Class:	
Pending	◄BellSouth►	Raulerson		Start
Obtainable	◄—AT&T—►	Bradbury (Shirley)		Finish:

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process. Provide status updates on current "Open" Trouble Tickets.

B AT&T wants proactive notification of status (Not necessary if EB)

C BellSouth Interim Plan

AT&T's end users will be treated as any other BellSouth customer - -until an electronic interface is established, appropriate BellSouth maintenance personnel will call AT&T if necessary (i.e., jeopardies and missed appointments).

D Action Item 1 — Contact:

BellSouth will determine if there are any differences between handling of single customers vs large complex customers and will provide any available documentation on the differences. Further discussion is required For national accounts BellSouth uses "SIMS" which has timers for statusing (where does SIMS reside & is it part of EB Confirm that EB provides access into computer EU systems) TAFI/LMOS don't have timers like those used by WFA-controlled special services Gee· How would BellSouth classify new customers? (lines & revenue)? 1/31/95. Shirley AT&T will provide clarification on classes of customers for which proactive notification is needed

Long Term Plan

E

Action Item 2 — Contact:

Action Item 3 — Contact:

Action Item 4 — Contact:

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A AT&T Initial Resale Expectation | B Clarified Expectation | C BellSouth Resale Plan | D Action Item

1.B.1.d

Issue Status: Pending ◄-BellSouth-► Escalated ◄—AT&T—►
Contacts: Raulerson
Class:
Start:
Finish

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process Verify feature and function updates and corrections as they relate to an open Trouble Report

B If BellSouth confirms installation and AT&T receives a trouble report relative to a feature or function, AT&T wants to review initial order to insure that the service was installed

C BellSouth Interim Plan

In the interim, BellSouth will handle these inquiries as it does for its end users. The resolution of this issue is dependent upon the electronic interface.

D Action Item 1 — Contact:

BellSouth will provide documentation or guidelines on how this is handled today Further discussion is required. AT&T wants access to determine whether feature was translated, but BellSouth's technicians don't have that access today After trouble ticket is open, BellSouth repair will resolve internally Need to establish processes to resolve service order discrepancies Other information will be provided via electronic interface through trouble codes

Long Term Plan

Action Item 2 — Contact:

Action Item 3 — Contact:

E

Action Item 4 — Contact:

1.B.1.e

Issue Status: Pending ◄-BellSouth-► Escalated ◄—AT&T—►
Contacts: Bradbury (S-Shirley)
Class EC
Start: 3/11/96
Finish 4/15/96

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process: Provide a means for notifying AT&T of switch failures

B AT&T wants notification of major service outages to allow them to screen related trouble calls With electronic interface to LMOS, outages would be identifiable and restoral time available

C BellSouth Interim Plan

Long Term Plan

D Action Item 1 — Contact:

Action Item 2 — Contact:

Action Item 3 — Contact:

E

Action Item 4 — Contact:

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A AT&T Initial Resale Expectation	B Clarified Expectation	C BellSouth Resale Plan	D Action Items

1.B.1.f

Issue Status: Pending ◄–BellSouth–► Escalated ◄–AT&T–►

Contacts: Massey / Bradbury (Taber)

Class: EC

Start: 3/11/98

Finish:

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process. Provide dispatch status as well as location and ETA.

B Prior to electronic interface, AT&T wants ability to call BellSouth for status

C

BellSouth Interim Plan	D Action Item 1	Contact:
Long Term Plan	Action Item 2	Contact:
	Action Item 3	Contact:
E	Action Item 4	Contact:

1.B.1.g

Issue Status: Pending ◄–BellSouth–► Escalated ◄–AT&T–►

Contacts: Massey

Class: EC

Start: 3/11/98

Finish: 5/1/98

A BellSouth will provide AT&T with a "Real Time" electronic interface to perform the following functions related to the Maintenance process. Testing

B Expectation applies to SMAS access for special services circuits and MLT access for POTS

C

BellSouth Interim Plan	D Action Item 1	Contact:
Long Term Plan	Action Item 2	Contact:
	Action Item 3	Contact:
E	Action Item 4	Contact:

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1.B.15

Issue Status: Pending ◄-BellSouth-► Obtainable ◄—AT&T—►

Contacts:

Class:

Start:

Finish:

A BellSouth will provide an on-line transfer of any AT&T end-user "misdirected" trouble call to the AT&T repair center

B

C BellSouth Interim Plan

BellSouth will refer end user to their local service provider and will provide the number upon request, if BellSouth has number available.

Long Term Plan

D Action Item 1

AT&T will provide number to BellSouth. AT&T evaluating single number solution.

Contact:

Action Item 2

Contact:

Action Item 3

Contact:

E

Action Item 4

Contact:

1.B.16

Issue Status: Pending ◄-BellSouth-► Obtainable ◄—AT&T—►

Contacts:

Class:

Start

Finish

A AT&T and BellSouth will negotiate performance metrics for Service repair

B

C BellSouth Interim Plan

BellSouth believes discussions regarding metrics are premature until processes are in place. BellSouth will provide same level of service as provided to its end users.

Long Term Plan

D Action Item 1

Contact:

Action Item 2

Contact:

Action Item 3

Contact:

E

Action Item 4

Contact:

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A AT&T Initial Resale Expectation	B Clarified Expectation	C BellSouth Resale Plan	D Action Items

1.B.17

Issue Status: Pending ◄–BellSouth–► Obtainable ◄—AT&T—►

Contacts: Raulerson

Class :

Start:

Finish.

A Provide AT&T with an "escalation" and "expedite" process for Maintenance.

B

C BellSouth Interim Plan

BellSouth's objective is to provide resellers with the same quality service it provides its end users.

Long Term Plan

D Action Item 1

Will be addressed in work center discussions. BellSouth will evaluate template provided by AT&T. BellSouth will provide expedite procedures.

Contact:

Action Item 2

Contact:

Action Item 3

Contact:

E

Action Item 4

Contact:

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Tab C-4

Southern Region

Jay M. Bradbury
Manager

Room 12W47
Promenade II
1200 Peachtree St., NE
Atlanta, GA 30309
404-810-8005

April 29, 1996

Suzie Lavett
BellSouth
Room E5G 3535 Colonnade Parkway
Birmingham, Alabama 35243

VIA FACSIMILE

Dear Suzie:

RE: Local Maintenance Electronic Bonding

Until recently, BellSouth has repeatedly asserted that, with the exception of testing, they were ready to implement an interface that would provide capabilities to AT&T's work centers that were at parity with those available to BellSouth's Residence Repair Centers (RRC) and Business Repair Centers (BRC), by using the existing IXC EB Gateway.

During our April 17, 1996, Total Services Resale Maintenance Meeting, we had significant discussion concerning BellSouth's provisioning and development of local maintenance electronic bonding. Bob Anderson's description of the capabilities of the electronic bonding as being several steps backwards from the existing capabilities in BellSouth's centers was in sharp contrast to BellSouth's previous assertions.

Bob's description of the status and plans for local maintenance electronic bonding clearly does not represent an existing or planned interface designed to provide AT&T's centers and end users with a parity maintenance and repair experience. The disparity Bob describes places AT&T in a grossly disadvantaged position, and is totally unacceptable.

Bob stated that 82% of repair requests handled in the RRCs are entered into and flow through the Trouble Analysis Facilitation Interface (TAFI) system. Bob reported that TAFI provided real or near real-time interfaces to many other systems and databases in BellSouth, including various testing systems, CRIS, BOCRIS, PREDICTOR, and others which allow verification and testing of customer records, features, translations, facilities, etc. Bob indicated that clearing times using TAFI were routinely less than 40 minutes, and that using TAFI a Customer Service Analyst (CSA) could clear as many as 17 tickets an hour.

Bob said the remaining 18% are handled from a manual screening pool using the Loop Maintenance Operations Support (LMOS) system. Bob reported that requests in the manual screening pool might wait up to 2½ hours before being picked up for screening and testing. Bob stated that using LMOS a Maintenance Analyst (MA - a higher pay grade employee) could only clear 9 tickets an hour and that average clearing time was greater than double that of the TAFI tickets.

Bob reported that the existing and planned local maintenance electronic bonding interface to the RRCs and BRCs was only to LMOS, not to TAFI, and that therefore AT&T customer's reports would all be handled from the manual screening pool. This will not meet AT&T's requirements or provide parity for AT&T customers.

As I reported, AT&T has recognized the complexity and level of design effort necessary to implement a new local maintenance electronic bonding interface to the newest generation of operations support systems being provided in its own local work centers, and the potential for local maintenance volumes to exceed the

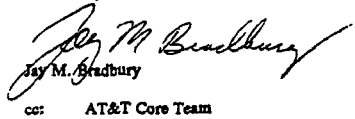
capacities of the existing IXC EB Gateway facilities. AT&T's implementation schedule does not call for the testing or use of local maintenance electronic bonding until late 4Q96 or possibly 1Q97, well after we have entered the local market.

We recommend that BellSouth utilize this additional interval to redesign its interface to provide AT&T with access to the TAFI system, and any future systems BellSouth might deploy, to provide parity for AT&T customers.

During the interim period methods and procedures for a telephonic work center to work center interface which will allow BellSouth to enter and clear AT&T customer's troubles using TAFI can be negotiated. AT&T believes an interim arrangement can be negotiated which will be acceptable to AT&T, more efficient for BellSouth than the LMOS only interface it has designed, and not disadvantage AT&T customers.

At our May 2, 1996, meeting AT&T expects BellSouth to commit to develop and implement for testing on December 2, 1996, a local maintenance electronic bonding interface providing capabilities to AT&T's work centers, including testing, that were on parity with those available to BellSouth's Residence Repair Centers (RRC) and Business Repair Centers (BRC). Further AT&T expects BellSouth to be able to commit to interim telephonic methods and procedures for the interval from the planned start of joint local market entry interface testing on July 1, 1996, until local maintenance electronic bonding is fully implemented.

Yours truly,



Jay M. Bradbury

cc: AT&T Core Team

Tab C-5

cc: RB, LB(Trish), BS

DOCKET# 6352
DOCUMENT# 11331

Georgia Public Service Commission

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DOCKET NO. 6352-U

IN RE: **Petition of AT&T for the Commission to Establish Resale Rules, Rates, Terms and Conditions and the Initial Unbundling of Services**

Record Submitted. March 4, 1996
March 5, 1996
April 1, 1996
April 2, 1996
April 3, 1996

Decided: May 29, 1996

APPEARANCES

On Behalf of the Commission Staff:

Nancy Gibson, Special Assistant Attorney General
David L Burgess, Director, Rates and Tariffs

On Behalf of the Consumers' Utility Counsel:

Jim Hurt, Attorney
Bill Atkinson, Attorney

On Behalf of AT&T of the Southern States, Inc. :

Roxanne Douglas, Attorney

On Behalf of BellSouth Telecommunication, Inc. :

William J. Ellenberg, II, Attorney
Douglas Lackey, Attorney
Tom Alexander, Attorney

On Behalf of Cable Television Association of Georgia:

Laura Nix, Attorney

On Behalf of BellSouth Advertising and Publishing Company:

Michael S Bradley, Attorney

On Behalf of MCI Telecommunications Corporation:

David Adelman, Attorney
Marsha Ward, Attorney

On Behalf of Sprint Communications Company, L.P. :

Benjamin Fincher, Attorney
Carolyn Tatum Roddy, Attorney

On Behalf of MFS Intelenet of Georgia, Inc. :

James Falvey, Attorney

On Behalf of ACSI:

James Rice, Attorney

On Behalf of Southern Directory and Georgia Public Communications Association:

Dean R. Fuchs, Attorney

BY THE COMMISSION:

INTRODUCTION

The Georgia Public Service Commission ("Commission") is charged with implementing and administering Georgia's new Telecommunications and Competition Development Act of 1995, O.C.G.A. § 46-5-160 *et seq* (hereafter "the Georgia Act"). As a part of this responsibility, the Commission shall determine the reasonable rates, terms or conditions for the purchase or resale of local exchange service, and the Commission shall have the authority to require local exchange companies to provide additional interconnection services and unbundling

Under O.C.G A. § 46-5-164(e), any local exchange company or telecommunications company desiring to purchase or resell services purchased from another local exchange company may petition the Commission for the authorization to purchase or resell such services On December 21, 1995, AT&T Communications of the Southern States, Inc ("AT&T") filed a petition with the Commission requesting the establishment of rules, rates, terms and conditions for the resale of telecommunications services as provided by the Georgia Act AT&T also sought an initial unbundling of services pursuant to the Commission's express authority under O C.G A. § 46-5-164(g).

On February 6, 1996, the Commission adopted a Procedural and Scheduling Order in this docket which outlined the manner in which this proceeding would be conducted. Subsequent to AT&T filing its petition in this docket, on February 8, 1996, the Telecommunications Act of 1996 ("the Federal Act") became law Pub L. No. 104-104, 110 Stat. 56 (Feb. 8, 1996). The 1996 Federal Act makes sweeping changes in telecommunications, laying the groundwork for competition to grow nationally in the local exchange market The Federal Act requires incumbent Local Exchange Carriers (LECs) to "offer for resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers." (Section 251(c)(4)(A)). The Federal Act further requires that a State Commission shall determine wholesale rates for those incumbent LEC services available for resale (Section 252(d)(3)).

The Consumers' Utility Counsel ("CUC"), BellSouth Telecommunications Inc ("BellSouth"), Cable Television Association of Georgia ("CTAG"), BellSouth Advertising and Publishing Company ("BAPCO"), MCI Telecommunications Corporation ("MCI"), Sprint Communications Company ("Sprint"), ATA Communications, Inc ("ATA"), MFS Intelenet of Georgia, Inc ("MFS"), American Communications Services of Columbus ("ACSI"), Competitive Telecommunications Association ("COMPTEL"), Southern Directory and Georgia Public Communications Association ("GPCA") filed intervention notices in this docket. Hearings were held March 4-5, 1996, and April 1-3, 1996 Post-hearing briefs were filed on April 16, 1996, by AT&T, CUC, BellSouth, MCI, COMPTEL, Sprint, MFS and BAPCO

FINDINGS OF FACT, CONCLUSIONS OF LAW AND DECISIONS OF REGULATORY POLICY

Based upon the entire record in this proceeding, including those matters incorporated by reference, the Commission hereby renders the following findings of facts, conclusions of law, and decisions of regulatory policy:

JURISDICTION

Jurisdiction is proper with the Commission and the Commission has authority to render a decision in this matter pursuant to O.C G.A. § 46-5-164(e) and § 46-5-164(g)

AT&T's petition specifically requests that the Commission (1) establish resale rules, (2) establish the rates, terms and conditions for resale as authorized by the Georgia Act, including the appropriate wholesale rates and the guidelines for operational interfaces, (3) require the initial unbundling of operator services, directory assistance and appropriate routing of repair calls, and (4) adopt the Total Wholesale Service tariff for providing wholesale services to resellers as proposed by AT&T.

The Company's petition rightfully notes that unlike interconnection services, the Georgia Act does not require negotiations to establish the rates, terms and conditions for resale of telecommnunications services prior to petitioning the Commission for these purposes AT&T and BellSouth have engaged in multiple negotiations sessions over a four month period concerning resale and other matters pertinent to local competition in Georgia AT&T has been unable to reach an agreement with BellSouth that will allow AT&T to enter the local exchange market The Commission finds that AT&T filed this petition seeking relief from the Commission after unsatisfactory lengthy negotiations with BellSouth

On March 12, 1996, the Commission issued a memorandum to all parties of record requesting that they submit to the Commission their assessment of the impact of the Federal Act on the Commission's ability to grant the relief sought by AT&T in the manner set forward in the Company's petition and supporting prefiled testimony Several parties responded to the Commission's request.

Section 251(c)(1) of the Federal Act provides that an incumbent LEC has the duty to negotiate in good faith on various local competition issues including resale of services and the unbundling of network elements. Under Section 251(c)(4) of the Federal Act, incumbent local exchange carriers must offer for resale any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers. Section 252(d)(3) of the Federal Act requires the Commission to arbitrate failed negotiations on resale and directs the Commission to determine wholesale rates for services to be resold. With regard to unbundling, an incumbent LEC has a duty under Section 251(c)(3) of the Federal Act to provide any requesting telecommunications carrier, nondiscriminatory access to network elements at any technically feasible point on an unbundled basis at rates, terms, and conditions that are just, reasonable, and nondiscriminatory.

O C G A. § 46-5-164(e) provides that in cases where the purchase or resale of services purchased is authorized by the Commission, the Commission shall determine the reasonable rates, terms, or conditions for the purchase or resale O.C.G A § 46-5-164(g) further provides that the Commission shall have the authority to require local exchange companies to provide additional interconnection services and unbundling.

The Federal Act states at Section 261(b) that "[n]othing in this part shall be construed to prohibit any State Commission from enforcing regulation prescribed prior to the date of the enactment of the Telecommunications Act of 1996, or from prescribing regulations after such date of enactment, in fulfilling the requirements of this part, if such regulations are not inconsistent with the provisions of this part." The Commission finds that no material conflicts exist between the two Acts with regard to resale and to unbundling Generally the Federal Act is more specific with regard to the requirements for resale and unbundling, while the Georgia Act leaves these matters for the Commission to decide.

SERVICES AVAILABLE FOR RESALE

Several parties presented testimony regarding what services should be made available for resale Specifically, AT&T requested that all existing retail services, including grandfathered service offerings and new services as they are available be offered for resale MCI presented testimony which stated that services available for resale should also include any discounted retail service, discount package, or promotional offering BellSouth advocated that grandfathered services, promotional offerings, and certain discount packages should not be made available for resale Other parties encouraged the Commission to adopt the standard contained in Section 251(c)(4)(A) of the Federal Act

The Commission finds that all existing retail services sold to non-telecommunications providers except those services which are presently grandfathered shall be made available for resale This includes any discounted retail service, discounted package, and new service offerings as they become available. Promotions are not included because they are not tariffed offerings. Grandfathered services shall not be available for resale. These services by definition are no longer available to any new subscription To allow grandfathered services to be resold would serve to undermine this basic definition The Commission finds that it shall continue to monitor the grandfathered provision and the offering of special promotions to insure that they are implemented in a way that is consistent with existing Commission policy.

RESTRICTIONS ON RESOLD SERVICES

AT&T advocated that the Commission impose limited restrictions on services resold All parties presented similar testimony requesting that the Commission adopt certain class of service restrictions and the interLATA joint marketing restriction contained in the Federal Act. Generally, parties agreed that it would be necessary for the Commission to impose a restriction on resale between classes of local service, such as resale of residential local exchange service to business customers Sprint noted in its prefiled testimony that. "[t]he price differential between business and residential customers would collapse unless resale between these classes is restricted or until local rates are rebalanced to eliminate the differential between business and residential customers." (Tr. at pp. 657-658).

Section 271(e)(1) of the Federal Act provides that until a Bell operating company is authorized to provide interLATA services in an in-region State, or until 36 months have passed since the date of enactment of the Telecommunications Act of 1996, whichever is earlier, a telecommunications carrier that serves greater than 5 percent of the nation's presubscribed access lines may not jointly market in such State telephone exchange service obtained from such company with interLATA services provided by that telecommunications carrier.

The Commission finds that it shall impose class of service restriction on the resale of all retail service offerings In addition the Commission finds that it shall adopt the interLATA joint marketing restriction contained in the Federal Act.

WHOLESALE SERVICES TARIFF

AT&T witness Guedel included as an attachment to his prefiled testimony an "illustrative" Total Wholesale Services Tariff for providing wholesale services to resellers as proposed by the Company. The proposed tariff included limited terms and conditions for the wholesale provisioning of resold services. AT&T requested that the Commission adopt specific provisions which included a 90 day advance notice on new offerings and 30 day advance notice on promotions Several parties presented testimony requesting that a separate wholesale tariff be established

The Commission finds that AT&T's "illustrative" Total Wholesale Tariff is simply that, "illustrative" and therefore incomplete, inadequate and shall not be adopted. The Commission further finds that AT&T's request to establish a 90 day advance notice on new service offerings has not been adequately supported. BellSouth shall be required to file a separate complete Wholesale Tariff containing the rates, terms and conditions for all services provided This initial filing as well as proposed revisions shall be subject to Commission approval. All proposed revisions to this tariff shall comply with the existing 30 day filing requirement BellSouth shall continue to comply with the existing provision in its General Subscriber Service Tariff which requires a 30 day notice to the Commission on all promotional offerings.

AVOIDED COST METHODOLOGY

The Federal Act provides that State Commissions shall set wholesale prices for telecommunications services on the basis of retail rates charged to subscribers for the telecommunications services requested, excluding the portion thereof attributable to any costs that will be avoided by the local exchange carrier (Section 252(d)(3)).

All parties generally agreed that the Federal Act standard is the appropriate basis for the Commission to determine wholesale rates, however several parties did provide their own unique interpretation of what that standard means. Sprint witness Key advocated that the Commission determine "net" avoided cost utilizing Total Service Long Run Incremental Cost (TSLRIC). Several parties recommended the Commission determine avoided cost using readily available embedded cost information. MFS and CUC also recommended the Commission adopt a "net" avoided cost approach Under this approach, determination of avoided cost would include any added costs of providing a service at wholesale BellSouth witness Maddox presented testimony that "[i]n our study, we looked at the costs that BellSouth would avoid making services available for resale We did not take into account the increased costs that would occur for offering the services on a resale basis " (Tr. at pp 523-524) MCI witness Dr Ankum's prefiled testimony indicated that any "net" avoided cost should be recovered in the service mark-up (Tr. at pp 842).

ATA witness Schwartz recommended that the Commission establish a lower wholesale rate for an extended term agreement than for a short-term arrangement ATA advocates that "[t]he wholesale rate in an extended resale agreement must reflect the downward pressure on retail price and the upward pressure on marketing and sales costs that will result from increased competition in the local exchange market." (Tr. at pp 708). MFS and Sprint also recommended wholesale rates be established service by service. Testimony presented by BellSouth and Sprint encouraged the Commission to establish separate discounts for residential and business wholesale services to reflect the current differentials which exist between similar retail offerings.

The Commission finds that the Federal Act standard is the appropriate method to determine avoided cost. The Commission rejects the argument of "net" avoided cost forwarded by several parties. Evidence presented in this docket indicates that TSLRIC studies for the items in question have not been conducted and to do so would require several months. The Commission shall initially use embedded cost information to determine avoided cost as specified in the Federal Act. The Commission further finds that a separate discount shall be determined for each customer class and the discount shall apply equally to all services in BellSouth's wholesale tariff The Commission finds that negotiated agreements may reflect additional discounts for longer terms

WHOLESALE DISCOUNT RATE

AT&T and BellSouth were the only parties who presented an avoided cost study in this docket AT&T's study yielded an overall wholesale discount rate of 28 3% BellSouth's study resulted in a 11% discount for residential wholesale offerings and a 9.5% discount for business services. MCI, ATA, and COMPTEL did not conduct their own study, but generally supported AT&T' s avoided cost study results CUC recommended that the Commission establish a floor level discount reflective of the BellSouth cost study results, and maintain a ceiling discount of 20% as ordered by the Illinois Commerce Commission MFS did not conduct its own study, but cautioned the Commission that deep discounts discourage the beneficial development of facilities-based competition MFS further stated that BellSouth's estimate of avoided cost are more consistent with the underlying principles of the Federal Act.

A review of AT&T's avoided cost study finds the Company utilizes embedded expense and revenue data which BellSouth reported to the Federal Communications Commission (FCC) in the 1994 Automated Report Management Information System (ARMIS), specifically Reports 43.03 and 43.04. AT&T's cost model removes all or some portion of direct and indirect costs which AT&T believes are avoided when selling services wholesale. The AT&T study shows direct costs avoided as follows. 100% of the cost for uncollectibles, 100% of the expenses associated with marketing, sales, and advertising and billing, and 20% of the Operator-Testing and Operator-Plant Administration expenses. AT&T's study also shows avoided cost to include 100% of operator related costs, such as call completion and number services functions AT&T maintains that these functions will be performed by the Company's own operators

There are also indirect costs which AT&T's Cost Model shows as avoided These include 21 73% of various General and Administrative expenses--including corporate expenses, finance, regulatory, legal, taxes, depreciation, general support, network support, research and development, and other general and administrative expenses. AT&T's Cost Model yields a 28.3% wholesale discount

BellSouth's Avoided Cost Model used that company's actual 1995 year-end financial data for the state of Georgia as reflected in the FR-1 report and the MR-5 BellSouth's study reflects avoided cost in the categories of uncollectibles, marketing, sales, and customer service BellSouth's Cost Model does not reflect any avoided cost in advertising, product management, call completion services, number services, or indirect cost BellSouth's study contains avoided cost of $12,396,537 for uncollectibles, $39,906,057 for marketing and sales, and $84,823,776 for customer services The total avoided costs included in BellSouth's study are $137,126,370 This computed level of avoided cost represents only 6.7% of the total expenses ($1,995,838,130) incurred by BellSouth for its Georgia operations during 1995 In other words, the Company has deemed 93.3% ($1,861,747,721) of its total expenses as unavoidable BellSouth maintains that the appropriate wholesale discounts are 11% for residential and 9 5% for business

Herein lies the fundamental difference between the parties regarding the cost that should be reflected in the determination of BellSouth's wholesale discount. BellSouth, MFS, and other supporting parties argue that the discount should reflect the costs that are actually avoided when provisioning wholesale local services. AT&T, MCI, ATA and COMPTEL advocate that all costs that are avoidable, whether or not they are actually avoided, should be reflected in the determination of the wholesale discount

The Federal Act states that a resale discount should reflect the

> "[r]etail rates charged to subscribers for the telecommunications service requested, excluding the portion thereof attributable to any marketing, billing, collection, and any other costs that will be avoided by the local exchange carrier " (Section 252(d)(3)).

BellSouth has interpreted the relevant portion of the Federal Act relating to the determination of a wholesale discount in a very strict manner BellSouth maintains that many functions now performed for the provisioning of retail services will not be avoided in a resale environment The Company believes that significant advertising, sales, and other related expenses will not be avoided in a wholesale situation BellSouth's position reflects a narrow, constrained view of an avoided cost approach.

AT&T and its supporting parties have taken a broader interpretation of the language in the Federal Act, arguing that avoidable cost is the standard mandated by the recently passed Federal legislation Under this approach avoidable cost include not only direct cost, but also indirect cost and resulting overheads associated with an avoided job function AT&T's position supports the inclusion of expenses such as depreciation, administrative expense and corporate overhead to the extent that they are avoidable

While neither approach is inherently precise, the Commission finds that in this instance a forward-looking avoidable cost approach yields more relevant and reliable results than a historical based avoided cost approach. This view holds particularly true in light of the sweeping changes taking place in the telecommunications industry ATA witness Schwartz noted. "[i]s it not true that BellSouth has been downsizing and that the very downsizing they're doing should and is being created by competition and resale, and that this cost should be reflected in deriving that avoided cost? I think it's an important issue and I think it's one that should be taken into consideration as part of the wholesale rate." (Tr at pp 699). BellSouth's strict avoided cost approach would potentially inhibit or otherwise severely limit the development of a competitive local exchange market. The Commission's endorsement of such an approach would provide BellSouth with little incentive to reduce or shed costs which are actually avoidable These potentially avoidable costs would continue to be subsidized by the Company's competitors, thereby virtually eliminating any form of meaningful competition

AT&T's response to CUC's Hearing Request (hereinafter referred to as "AT&T Hearing Resonse"), filed April 1, 1996, reflects the status of the Rochester Telephone Company (RTC) trial where AT&T has ceased marketing its competing local services On October 3, 1995, AT&T filed a complaint with the New York Commission seeking relief for reasons of price and service provisioning The Complaint states: "[t]he RTC 5% wholesale discount on local service is precisely such a commercially unreasonable discount It is noteworthy that the discount is so patently inadequate that only AT&T has even attempted to offer services on a resale basis pursuant to its terms " (Petition of Rochester Telephone Corporation for Approval of Restructing Plan Case 93-C-0103 N Y.P S C , Petition of Rochester Telephone Corporation for Approval of a New Multi Year Rate Stability Agreement Case 93-C-0033 N.Y P.S C., AT&T Communications of New York, Inc Complaint, Petition For Declaratory Judgement and for Reconsideration of Opinion No 94-25 N.Y.P.S.C., page 5).

The Commission finds that BellSouth's Avoided Cost Model represents a sound mathematical approach toward computing a wholesale discount. The data utilized to compile the study represents the most recent year-end information available for BellSouth's Georgia operations. The Commission finds that BellSouth does not properly account for certain expenses that are reasonably avoidable. The Commission finds that the data contained in the AT&T Cost Model is dated information and to some degree jurisdictionally mixed The Commission finds that the AT&T study overstates certain avoidable costs. The Commission finds that it is both necessary and prudent to revise the avoided cost contained in BellSouth's study to determine an appropriate wholesale discount

Appendix 1 reflects the calculations supporting the wholesale discount adopted by the Commission and a narrative explaining the adjustments made to BellSouth's Avoided Cost Model. Based on the results of the computation, the Commission finds that the appropriate wholesale discount is 20 3% for residential services and 17 3% for business services The Commission finds that these discounts shall apply to all recurring, non-recurring and intrastate toll retail offerings The Commission finds that the currently tariffed non-recurring charges for primary and secondary services with the appropriate discount will apply to resellers (See BellSouth's Response to Staff Hearing Request No. 3 to Lorraine Maddox, page 1 of 1) The Commission finds that these levels shall remain in effect for a 12 month period At the end of this 12 month period, the Commission shall conduct a review to determine if the need exists to modify these initial discount levels.

OPERATIONAL INTERFACES

AT&T has specifically requested that the Commission require BellSouth to establish electronic operational interfaces for pre-service ordering, service ordering and provisioning, directory listing and line information databases, service trouble reporting and customer daily usage data The Company has also requested that the Commission apply an additional 10% discount for BellSouth's failure to comply with the establishment of electronic interfaces. AT&T is supported in its request by MCI, ATA, and Sprint AT&T's Hearing Response reflects service provisioning concerns raised by the Company in its October 3, 1995 complaint filed against RTC with the New York Commission "AT&T is severely disadvantaged due to the fact that RTC has failed to provide procedures for resellers to access the RTC databases for on-line queries needed to perform basic service functions as scheduling customer appointments." (Petition of Rochester Telephone Corporation for Approval of Restructing Plan Case 93-C-0103 N.Y P S.C , Petition of Rochester Telephone Corporation for Approval of a New Multi Year Rate Stability Agreement Case 93-C-0033 N.Y P.S C., AT&T Communications of New York, Inc Complaint, Petition For Declaratory Judgement and for Reconsideration of Opinion No 94-25 N.Y P.S C , page 12). ATA witness Schwartz testified "[m]y concern is how do we now proceed to interface into their system, how do we provision those customers now with them. If we can't do it electronically, it's just going to be a disaster." (Tr at pp. 721).

BellSouth witness Scheye acknowledges that. "[n]o one is happy, believe me, with a system that is not fully electronic." (Tr at pp 430). Further testimony by Scheye indicates that "[i]n the initial stages we plan to use fax machines ... " (Tr. at pp 429) MFS and BellSouth recommended that the Commission delay the establishment of electronic interfaces until after national standards are set

The Commission finds that AT&T's request is timely and appropriate in that it is imperative that a reseller have access to the same service ordering provisions, service trouble reporting and informational databases for their customers as does BellSouth The Commission finds that BellSouth shall establish the requested operational interfaces by July 15, 1996. AT&T's request for an additional 10% discount is denied The Commission finds that access to these interfaces shall be made available to any requesting party at the same terms and conditions.

DIRECTORIES

AT&T has also requested that the Commission establish certain provisions regarding the maintenance of telephone directories The Company has specifically requested that (1) BellSouth be required to include basic white page listings for resellers' residential and business customers as well as yellow page listings for business customers, (2) additional or enhanced listings be made available to the reseller at the same rates, terms and conditions as available to BellSouth customers, (3) BellSouth make directory listing data available for purchase so that the reseller can package and brand its own white and yellow page directories and, (4) resellers be afforded the opportunity to place local customer service information in BellSouth's directories

BellSouth witness Scheye presented testimony that indicates that for all directory matters other than insertion of regular listings in the white pages, arrangement will be made with BellSouth's directory affiliate, BAPCO The brief filed by BAPCO on April 16, 1996, reflects a similar position BAPCO appropriately notes· "[t]his Commission historically has not asserted jurisdiction over publishing of Yellow Pages " (BAPCO brief). BAPCO has indicated an express willingness to provide the additional directory arrangements requested by AT&T. MFS, Sprint, MCI, ATA, COMPTEL and CUC did not take a position on this issue

The Commission finds that BellSouth shall include white page listings for all new resellers' customers in its directory. All other directory arrangements requested by AT&T should be pursued with BellSouth's service agent BAPCO

UNBUNDLED OPERATOR SERVICES

AT&T has requested the ability to purchase from BellSouth "branded" operator services (including directory assistance, 0+, 0- toll dialing, busy line verification and interrupt). Alternatively the Company has requested that BellSouth be ordered to provide selective routing arrangements that will enable an AT&T customer to reach an AT&T operator platform just as a BellSouth customer can reach a BellSouth operator today. MFS and Sprint support AT&T's request Sprint further recommended that custom branding for resellers is a service resellers should pay for, and some branding requests may not be technically feasible

BellSouth witness Scheye testified that the Company stands ready to unbundle any network elements required by telecommunications carriers where technically feasible BellSouth advocates that embedded cost should be utilized in determining the cost of an unbundled network element MCI, CUC, COMPTEL, and ATA did not take a position on this issue

The Commission finds that AT&T's request is valid and reasonable. The Commission finds that the ability of a competing carrier to utilize their own operators or custom "branded" operator services will enhance the ability of that entity to effectively compete However, sufficient evidence was not presented by the parties regarding technical limitations, implementation cost and cost recovery. Accordingly, until the parties are able to present credible evidence on these issues, the Commission cannot grant AT&T's request.

The Commission directs that AT&T and BellSouth submit a joint report to the Commission which addresses a resolution of these outstanding issues If the parties do not reach an agreement on these issues, each party should reflect their positions and factual evidence which supports same in the body of the report Absent a resolution, this report shall be used as a primary basis for a Commission decision regarding this matter.

WHEREFORE, IT IS:

ORDERED that all existing retail services sold to non-telecommunications providers except those services which are presently grandfathered shall be made available for resale. This includes any discounted retail service, discounted package, and new service offerings as they become available Promotions are not included because they are not tariffed offerings. The Commission shall continue to monitor the grandfathered provision and the offering of special promotions to insure that they are implemented in a way that is consistent with existing Commission policy.

ORDERED FURTHER, that the Commission shall impose class of service restriction on the resale of all retail service offerings In addition, the Commission shall adopt the interLATA joint marketing restriction contained in the Federal Act

ORDERED FURTHER, that within 30 days of the issuance of this Order BellSouth shall be required to file a separate complete Wholesale Tariff containing the rates, terms and conditions for all services provided. This initial filing as well as proposed revisions shall be subject to Commission approval All proposed revisions to this tariff shall comply with the existing 30 day filing requirement BellSouth shall continue to comply with the existing provision in its General Subscriber Service Tariff which requires a 30 day notice to the Commission on all promotional offerings.

ORDERED FURTHER, that the Federal Act standard of retail rates excluding avoided cost is the appropriate bases to determine wholesale rates. The Commission shall initially use embedded cost information to determine avoided costs as specified in the Federal Act. A separate discount shall be determined for each customer class and the discount shall apply equally to all services contained in BellSouth's wholesale tariff Negotiated agreements may reflect additional discounts for longer terms

ORDERED FURTHER, that the appropriate wholesale discount is 20.3% for residential services and 17.3% for business services. These discounts shall apply to all recurring, non-recurring and intrastate toll retail offerings. The currently tariffed non-recurring charges for primary and secondary services with the appropriate discount shall apply to resellers. These discount levels shall remain in effect for a 12 month period effective June 15, 1996 At the end of this 12 month period, the Commission shall conduct a review to determine if the need exists to modify these initial discount levels

ORDERED FURTHER, that BellSouth shall establish electronic operational interfaces for pre-service ordering, service ordering and provisioning, directory listing and line information databases, service trouble reporting and daily usage data by July 15, 1996. AT&T's request for an additional 10% discount is denied Access to these interfaces shall also be made available to any requesting party at the same terms and conditions. These interfaces shall provide access to resellers for their customers which is equivalent to that of the incumbent LEC. BellSouth and AT&T shall submit a joint report to the Commission within 30 days after this Order is issued which will update the activities and implementation time frames necessary to deploy these interfaces

ORDERED FURTHER, that BellSouth shall include white page listings for all new resellers' customers in its directory. All other directory arrangements requested by AT&T should be pursued with BellSouth's service agent BAPCO.

ORDERED FURTHER, that AT&T and BellSouth are directed to submit a joint report to the Commission within 30 days of the issuance of an Order in this docket which addresses a resolution of outstanding issues relative to AT&T's provision of its own operator services If the parties do not reach an agreement on these issues, each party should reflect their position and factual evidence which supports same in the body of the report Absent a resolution, this report shall be used as a primary basis for a Commission decision regarding this matter.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper

The above action by the Commission in Special Administrative Session on the 29th day of May, 1996

Terri M Lyndall
Executive Secretary

June 12, 1996
Date

Dave Baker
Dave Baker
Chairman

June 12, 1996
Date

CALCULATIONS SUPPORTING WHOLESALE DISCOUNT LEVEL

Appendix 1

The wholesale discount level was calculated utilizing the Avoided Cost Discount Model proposed by BellSouth witness Frank R Kolb The basis equation contained in Mr Kolb's model is reflected below

$$\%\text{DISCOUNT} = \frac{\text{COST AVOIDED AS A RESULT OF RESALE}}{\text{REVENUE FROM RESOLD SERVICES}} \times 100$$

The Commission has made adjustments to the avoided cost calculated by Mr Kolb to reflect additional avoided cost for sales, advertising, call completion services, number services and an assignment of indirect cost associated with the direct cost allocation contained in BellSouth's calculations. The numerical information utilized to make these adjustments was derived from Staff data requests submitted in the context of the public hearing regarding this matter.

The first adjustment the Commission made to BellSouth's avoided cost calculation is to recognize additional avoided cost associated with Sales The Company's study included $39,906,057 as avoided cost for Sales This represents 61% of the total sales expense incurred by BellSouth's Georgia Operations for 1995. The Commission has included in its calculation avoided cost for Sales of $48,675,614 This represents 75% of the total sales expense incurred by the Company After reviewing BellSouth's Account Records Categories for Sales (Account 6612) the Commission finds that many of the representative work functions contained therein will be avoided in a resale environment The Commission finds that the recommended avoided cost associated with Sales contained in this calculation is conservative at best.

The Commission finds that it is reasonable to assume that there is a direct correlation between Sales and Product Advertising. BellSouth did not include any product advertising cost as avoidable in their study The Company incurred product advertising expense of $17,566,591 for year-end 1995 The Commission finds that in order to remain consistent in its approach, it is appropriate and reasonable to conclude that 75% of the total product advertising cost will be avoided This yields avoided Product Advertising cost of $13,174,943. Likewise, a review of the Company's Account Records Categories for Product Advertising (Account 6613) reveals that many of these work functions will be avoided in the wholesale provisioning of services.

Several parties in this docket indicated their intention to utilize their existing operators to provide local operator and call completion services (i e., 0+, 0-, Directory assistance). BellSouth's study did not include any avoided cost related to Call Completion and Number Services which are expense categories directly related to the provision of operator services The Commission has included $3,031,565 in its calculation as avoided cost associated with Call Completion. This represent 25% of the total Call Completion expense incurred by the Company for 1995 Similarly, the Commission has included $8,281,083 in its calculation as avoided cost related to Number Services. This represents 25% of the total Number Service Expense incurred by BellSouth The Commission finds that a 25% allocator represents a reasonable initial assignment of cost that will be avoided Potentially, avoided cost in these areas may grow as competitors' call completion traffic increases.

The final adjustment the Commission made to the BellSouth cost study relates to the assignment of indirect cost which will be avoided The avoided cost identified in the Company's calculations are all related to directly assignable cost BellSouth did not reflect any indirect cost such as General Support, Administrative, or Corporate Operations in its study The total avoided cost included in the Company's study is $137,126,370 The total direct avoidable expense included in the Commission's calculations is $170,383,518. The Commission finds that in keeping with its forward-looking approach, it is reasonable to reflect a level of indirect avoidable cost associated with the direct avoidable cost previously identified and calculated

A review of previous cost studies submitted by BellSouth to the Commission reflect a range for indirect cost as a percentage of direct cost to be 30% to 50%. The Commission finds that it is reasonable to calculate the indirect avoided cost using a 50% factor This yields an additional avoidable expense of $85,191,759 This level represents less than 5% of the total expense($1,861,747,721) BellSouth deemed unavoidable The Commission finds that as with all the previous adjustments made to BellSouth's study, this estimate of indirect avoidable cost is extremely conservative The total avoidable cost (direct and indirect) calculated by the Commission is $255,575,277

The Commission utilized the same total revenues from resold services as contained in the BellSouth study The study contains residential revenues in the amount of $653,955,846 and business revenues of $709,781,717. The total revenues contained in the study are $1,363,737,563. The Company's study reflect that 52% of its total calculated avoided cost is attributable to residential services and 48% to business services The Commission utilized these same percentages in calculating its separate residential and business wholesale discounts

The Commission's Approved Discount Levels Are Calculated Below:

$$\text{RESIDENTIAL DISCOUNT} = \frac{\$132,899,144}{\$653,955,846} \times 100 = 20.3\%$$

$$\text{BUSINESS DISCOUNT} = \frac{\$122,676,133}{\$709,781,717} \times 100 = 17.3\%$$

Tab C-6

BellSouth's Preliminary Report

to the

Georgia Public Service Commission

Operational Interfaces Between BellSouth and Resellers

June 21, 1996

BELLSOUTH'S NARRATIVE REPORT
(ILLUSTRATED)

required for the completely mechanized process. Development will require approximately ten months, and will cost approximately $6 million to $7 million. BellSouth currently is moving forward with the design phase for this interface. However, with the fact that pre-ordering information is not necessary for the bulk of reseller orders, in addition to the fact that a workable alternative is currently in place, BellSouth should not be required to incur cost of that magnitude unless appropriate arrangements have been made for cost recovery.

In addition, given the complexities of this implementation, a July 15, 1996 implementation date is not possible. For example, the detailed design phase alone, which began in May, 1996, is expected to take approximately four months to complete, with an associated design development cost of approximately $500K. The subsequent implementation will require at lease six additional months, with an additional implementation cost estimated to be $5 million to $6 million. Actual implementation costs and timing will be determined during the design phase. The complexities include ordering and installing hardware for the communication links, development of presentation software to display the information obtained from the databases, and modifying the databases themselves to provide the necessary data to the presentation system. In light of the magnitude of this effort, the rapidly changing technological environment, and to be certain it is providing the best and most cost-effective interface to meet resellers' eventual needs, BellSouth continues to explore alternative solutions that might allow a phased approach to this massive undertaking.

Trouble Reporting

In keeping with its need to accommodate resellers with varying mechanization capabilities, BellSouth is prepared to accept either verbal or electronic trouble reports from resellers. In addition to its plans for accepting resellers' verbal trouble reports in the same centers serving BellSouth's end users, BellSouth has offered resellers an electronic interface for trouble reporting through the same electronic gateway that is now used by IXCs for access

services. Through this interface –which is available today – a reseller may report a trouble, obtain the same appointment interval that would be given to a BellSouth end user customer, subsequently add information to the report itself, check for trouble completion, and cancel the trouble report if necessary. In response to troubles reported via the gateway, BellSouth will test and initiate repair to the resold line. This arrangement is comparable to the electronic trouble reporting available for access customers today, as shown in Figure 5 on the following page.

In response to troubles reported either verbally or via the mechanized interface, BellSouth will ensure that all appropriate tests are performed for resellers' customers, just as they are for BellSouth's customers. However, to make it possible for testing to proceed in precisely the same sequence for electronic trouble reports as for verbal trouble reports, BellSouth has investigated the possibility of adding to the existing gateway an interface to a system called Trouble Analysis Facilitation Interface (TAFI). That interface would allow the reseller to access the same interactive testing sequence that BellSouth follows to reduce manual handling of troubles. The TAFI interface could be made available in 1997, assuming that appropriate arrangements are made for the recovery of the approximately $3 million development and implementation cost.

Billing Detail

Resellers currently have the option of receiving their monthly bills in any of several formats. Available options include:

- Electronic Data Interchange (EDI) transmission
- Diskette Analyzer Bill Format
- Magnetic Tape
- CD-ROM
- Paper

Comparison of Access and Resale Processes for Electronic Trouble Reporting

☎ Electronic communication for resale trouble reporting is comparable to the electronic process for access trouble reporting. Reseller also has the option to report verbally, just as IXCs do. Either way, resellers' end users are given the same repair appointment interval as BellSouth's end users.

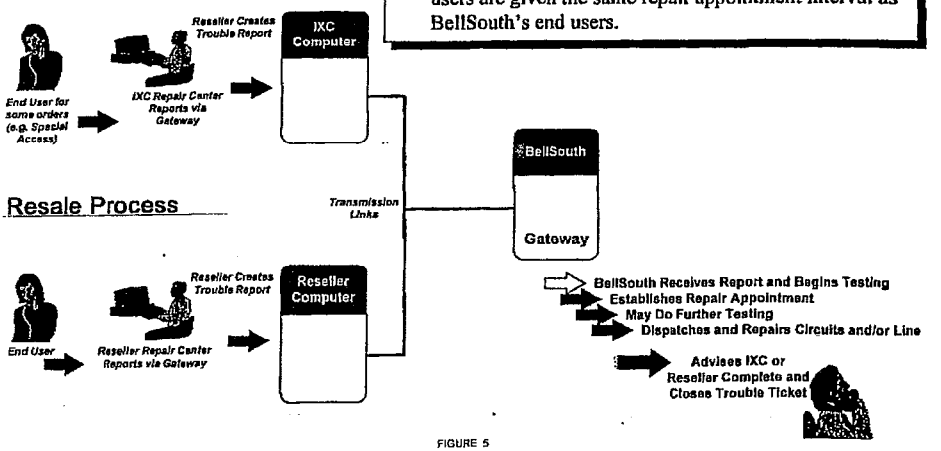

FIGURE 5

Tab C-7

cc: KB, BS, LG

Georgia Public Service Commission

244 WASHINGTON STREET SW
ATLANTA, GEORGIA 30334-5701
(404) 656-4501 OR 1 (800) 282 5813

DOCKET NO. 6352-U

ORDER

IN RE: **Petition of AT&T for the Commission to Establish Resale Rules, Rates, Terms and Conditions and the Initial Unbundling of Services**

Record Submitted: March 4, 1996
March 5, 1996
April 1, 1996
April 2, 1996
April 3, 1996

Decided May 29, 1996
July 2, 1996

APPEARANCES

On Behalf of the Commission Staff:

Nancy Gibson, Special Assistant Attorney General
David L. Burgess, Director, Rates and Tariffs

On Behalf of the Consumers' Utility Counsel:

Jim Hurt, Attorney
Bill Atkinson, Attorney

On Behalf of AT&T of the Southern States, Inc.:

Roxanne Douglas, Attorney

On Behalf of BellSouth Telecommunication, Inc.:

William J. Ellenberg, II, Attorney
Douglas Lackey, Attorney
Tom Alexander, Attorney

On Behalf of Cable Television Association of Georgia:

Laura Nix, Attorney

On Behalf of BellSouth Advertising and Publishing Company:

Michael S. Bradley, Attorney

On Behalf of MCI Telecommunications Corporation:

David Adelman, Attorney
Marsha Ward, Attorney

On Behalf of Sprint Communications Company, L.P.:

Benjamin Fincher, Attorney
Carolyn Tatum Roddy, Attorney

On Behalf of MFS Intelenet of Georgia, Inc.:

James Falvey, Attorney

On Behalf of ACSI:

James Rice, Attorney

On Behalf of Southern Directory and Georgia Public Communications Association:

Dean R. Fuchs, Attorney

BY THE COMMISSION:

On June 21, 1996, BellSouth Telecommunications, Inc. ("BellSouth") filed a Motion for Reconsideration and Clarification of the Commission's Order issued June 12, 1996, in Docket No. 6352-U. BellSouth filed its motion requesting the Commission reconsider and clarify a number of items in its Order, including the requirement imposed upon BellSouth to provide resellers of BellSouth's telecommunications services with a number of electronic interfaces by July 15, 1996. BellSouth also filed with its motion a preliminary report on the status of operational interfaces for resellers. BellSouth filed an update to its preliminary report on July 1, 1996.

BellSouth and AT&T Communications of the Southern States, Inc. ("AT&T") have held on-going negotiations regarding these interface issues in an attempt to reach an agreement on the matter. Both parties have submitted separate responses to the Commission indicating the two companies have not been able to reach an agreement. The purpose of this Order is only to rule on the portion of BellSouth's Motion for Reconsideration and Clarification dealing with electronic interfaces. The Commission is scheduled to rule on the remaining issues contained in the Motion for Reconsideration and Clarification at its next regularly scheduled Administrative Session.

FINDINGS OF FACT, CONCLUSIONS OF LAW AND DECISIONS OF REGULATORY POLICY

Based upon the entire record in this proceeding, including those matters incorporated by reference, the Commission hereby renders the following findings of facts, conclusions of law, and decisions of regulatory policy:

1.

BellSouth's Operational Interfaces Preliminary Report and Update submitted to the Commission on June 24, 1996, provides detailed documentation regarding the status of the development, cost and projected implementation dates for the various electronic interfaces requested by AT&T and other potential resellers. The Commission understands that the implementation of all systems and processes necessary for offering resold local exchange service is a complex undertaking for all parties involved. Based upon a careful review and analysis of BellSouth's reports, the Commission finds it necessary to amend the implementation time frame set forth in its June 12, 1996 Order.

WHEREFORE, IT IS:

ORDERED that AT&T and BellSouth are to establish by July 22, 1996 a joint Implementation Team to assure effective implementation of the electronic interfaces and compliance with the Commission's Order.

ORDERED FURTHER, that with respect to the Pre-ordering category of electronic interfaces:

1. BellSouth is to provide by September 15, 1996 as a part of the Phase 1 implementation, the LAN-to-LAN access to the Regional Street Address Guide.

2. BellSouth is to provide AT&T by August 15, 1996 as a part of the Phase 1 implementation, the ability to transfer files of reserved telephone numbers via diskette.

3. BellSouth is to provide AT&T by October 15, 1996 as part of the Phase 1 implementation, the ability to electronically transfer files of reserved telephone numbers.

4. BellSouth is to provide AT&T by August 15, 1996 the technical specifications and process for what BellSouth describes as Phase II interactive solution.

5. BellSouth is to provide AT&T as a part of the Phase II implementation, BellSouth's proposed Phase II solution by December 31, 1996 but no later than April 1, 1997

ORDERED FURTHER, that with respect to the Ordering category of electronic interfaces:

1. BellSouth is to provide AT&T its technical specification and processes for interactive direct order entry by August 15, 1996.

2. BellSouth is to make fully operational and available by December 15, 1996 the Electronic Data Interface capability for receipt and transmission of orders for services in BellSouth's General Subscriber Services and Private Line Tariffs.

3. BellSouth is to implement an interactive direct order entry capability to be fully available by March 31, 1997.

ORDERED FURTHER, that with respect to the Maintenance and Trouble Reporting category of electronic interfaces:

1. BellSouth is to provide to AT&T by August 15, 1996 the technical specifications and process for TAFI interface.

2. BellSouth is to complete the TAFI enhancements to allow full operation of the required access by March 31, 1997.

3. AT&T and BellSouth are to include the necessary activities for electronic interfaces in the Joint Implementation Team discussed above.

ORDERED FURTHER, that with respect to the Daily Usage Data category of electronic interfaces:

1. BellSouth is to complete the work necessary so that it can provide unrated messages to AT&T by September 1, 1996.

ORDERED FURTHER, that orders placed through the operational interfaces shall be processed by BellSouth based on the time that the order was received by BellSouth, and not when the order was initially processed.

ORDERED FURTHER, that all cost incurred by BellSouth to implement these operational interfaces shall be recovered from the industry. If there is disagreement between the parties regarding cost recovery issues, the Commission shall initiate a separate hearing to address the matter upon the filing of a petition by any affected party.

ORDERED FURTHER, that BellSouth shall submit a monthly surveillance report to the Commission updating the activities undertaken to implement the requested operational interfaces. The initial report shall be filed no later than August 15, 1996.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering and ruling on the remaining portion of BellSouth Motion for Reconsideration and Clarification and entering such further Order or Orders as this Commission may deem just and proper.

The above action by the Commission in Administrative Session on the 2nd day of July, 1996

Terri M. Lyndall
Executive Secretary

Dave Baker
Chairman

July 11, 1996.
Date

July 11, 1996
Date

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the matter of:	)	
	)	
AT&T Petition for the Commission to	)	
Establish Resale Rules, Rates and Terms	)	**Docket No. 6352-U**
and Conditions and the Initial Unbundling	)	
of Services	)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Order in the above-referenced docket was filed with the Commission's Executive Secretary, and a copy of same was served upon all parties and persons listed below via hand-delivery where indicated by an asterisk, or by depositing same in the United States mail with sufficient postage thereon to insure delivery and addressed as follows:

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So certified this 11th day of July, 1996

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Nancy G Gibson
Special Assistant Attorney General
State Bar No. 293019
Counsel for the Commission Staff

Tab C-8

DRAFT DRAFT DRAFT

August 9, 1996 Draft of

BellSouth's Report to the Georgia Public Service Commission

Electronic Interfaces for Local Service Resellers

Monthly Surveillance Report

Report as of August 9, 1996

DRAFT DRAFT DRAFT

TECHNOLOGY SPECIFICATION

BELLSOUTH RESELLER INTERACTIVE DIRECT TROUBLE REPORT ENTRY SYSTEM

ACCESS METHOD

BellSouth is building an interface system that allows the Reseller to perform interactive direct trouble report entry. This interface system has several advantages over accessing multiple BellSouth legacy systems individually. It eliminates the need for the Reseller to log into multiple systems in order to complete the interactive direct trouble report entry process. The Reseller is required to log on to BellSouth's system only once. The interactive direct trouble report system takes care of sending and retrieving data from the legacy systems. To complete a trouble report entry, several systems are typically accessed. The output from one system is often the input for the next. By building an interface in front of these systems, the Reseller is freed from manually taking the output of one system and then using it for input to the next. The interface takes care of this automatically, quickly and more accurately than an individual could accomplish without it. The systems BellSouth's repair technicians use employ a similar methodology.

This interface will utilize World Wide Web hypertext screens. This technology is now widely accepted within the industry and offers many advantages over other presentation formats It allows the Reseller to use various types of terminal equipment capable of running a web browser. This includes PCs, Macs, UNIX workstations, Mainframes, and some non-graphical terminals. BellSouth plans to deploy the interactive direct trouble report system on a BellSouth web server.

CONNECTIVITY

The Reseller has three choices for connecting to BellSouth's web server: LAN-to-LAN, dial-up, and the public Internet. The communication path used will not affect the screens seen by the Resellers. Regardless of the connection choice by the Reseller, the connectivity chosen will support access to the pre-order system, the interactive direct order entry system and the interactive direct trouble report entry system

If a LAN-to-LAN connection is implemented, the Reseller provisions a single circuit from his LAN to a BellSouth secure router. This router serves as a firewall and directs Reseller traffic directly to the BellSouth web server where the

interactive direct trouble report system is deployed. The Reseller is required to sign-on to the trouble report system for authentication. Data flowing between the Reseller's terminal and BellSouth's interactive direct trouble report system utilizes this dedicated connection, but functions like the public Internet's World Wide Web.

If dial-up connectivity is selected, the Reseller is required to purchase an electronic security card. The Reseller dials into a BellSouth modem pool and is authenticated using the security card. After authentication, the Reseller is connected to the interactive direct trouble report entry system's web server. At this point, the Reseller begins using his web browser software to interact with the system's hypertext screens. This methodology has been successfully deployed within BellSouth for both internal and external customers.

If public Internet connectivity is selected, the Reseller simply accesses the Web through any means desired. The Reseller is required to purchase an electronic security card. Once connected, the Reseller uses a web browser to access BellSouth's interactive direct trouble report entry system web server. The Reseller is required to log on using the security card for authentication. Once authenticated, the Reseller is presented with the interactive direct trouble report interface.

LAN-to-LAN response times will be similar to those experienced by BellSouth users on our intranet. The presentation from the Web Server will be the same regardless of access method, but actual response times during dial-up access may be restricted by modem speed limitations. Currently, BellSouth employs modems with 28.8 kilobits per second capability. The response times over the public Internet may be affected by the user's Internet service provider and other factors that affect the public Internet.

CUSTOMER REQUIREMENTS FOR ACCESS

The Reseller may use a variety of terminal and software packages. The terminal and software packages must provide LAN connectivity and WWW Browser support. If a dial-up connection is used, the package must provide for PPP (Point-to-point protocol) dial-up access. The browser must support encryption and secure cookies. (A secure cookie is a named piece of information that the browser will only offer to a server if the appropriate level of security has been set up between the browser and the server.) Acceptable browsers include, but are not limited to, Netscape's Navigator 2.02 and Microsoft's Internet Explorer 3.

For any access other than LAN-to-LAN, the Reseller must purchase one security card for each user.

PROCESS

The following actions may be taken after the user is connected interactive direct trouble report entry system and has been authenticated. Additional screens and steps will be added as needed during development of the system.

Trouble Entry:

- The user will choose the option to enter a new trouble.
- The user will enter the information into the trouble form.
- The user will submit the trouble report form.
- The system will provide validations, including validations against background systems.
- The system will check for currently reported troubles
- The system will check BellSouth's systems and take corrective actions where appropriate.
- The system will respond to the user with the status, including any currently known troubles, and if corrective actions were taken.
- If the user wishes to place a trouble report with BellSouth, the user may fill in the returned screen and select an option to place a trouble report.
- Otherwise, the user shall select an option to not continue with the trouble report.
- If the user selects the option to place a trouble report, the system will return a trouble report number to the user and place the report into BellSouth's trouble and maintenance systems.

Trouble Status:

- The user will choose the option to get a trouble status.
- The user will enter the trouble report number and submit the form.
- The system will check BellSouth's trouble and maintenance systems and return a status to the user.

Trouble Report Modification:

- The user will choose the option to modify an existing trouble report.
- The user will enter the current trouble report number into the form.
- The system will return limited information about the existing trouble.

- The user will populate the supplemental information.
- The user will submit the supplemental trouble report form.
- The system will provide validations, including validations against background systems.
- If the supplemental report is valid and the current trouble is in an appropriate state, status information will be returned and the trouble report will be modified in BellSouth's trouble and maintenance systems.
- If the supplemental report is not valid, or if the current report is not in an appropriate state, appropriate error messages will be returned identifying the field(s) in error. These may be corrected and the trouble report resubmitted

Timeline

The BellSouth Interactive direct trouble report entry team is currently being staffed. Milestones will be set jointly between BellSouth and AT&T. The interactive direct trouble report entry System will be completed by March 31, 1997 pursuant to Georgia Public Service Commission document # 6352-U.

Tab C-9

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF GLORIA CALHOUN

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 960833-TP

AUGUST 12, 1996

Q. Please state your name, address and position with BellSouth Telecommunications, Inc. ("BellSouth").

A. My name is Gloria Calhoun My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am employed by BellSouth Telecommunications, Inc. as a Manager in the Strategic Management Unit. In that position I handle responsibilities associated with operations planning for local competition

Q. Please summarize your background and experience.

A. I graduated *summa cum laude* with a Bachelor of Arts degree in Economics from the University of North Florida. In 1995, I completed a management program at the Georgia Tech Management Institute. I began my BellSouth career in 1981 when I joined the Southern Bell Business Marketing organization in Jacksonville, Florida. In that capacity I was responsible for coordinating the interdepartmental efforts needed to implement complex voice systems and associated exchange

real-time, interactive access to pre-ordering information. Meanwhile, this information is not even necessary to enable AT&T to compete for existing customers who simply choose to switch local service providers.

Electronic Interfaces for Maintenance and Repair

Q. AT&T claims in its petition that BellSouth has been unwilling to make a real-time, interactive electronic interface available for trouble reporting. Is this true?

A. No, it is not true. BellSouth has a fully electronic, real-time, interactive trouble reporting interface currently available for use by ALECs. In addition, at AT&T's request BellSouth has under development an enhancement that will provide ALECs with access to the same interactive testing capabilities BellSouth uses to screen POTS trouble reports. Finally, in keeping with its need to accommodate ALECs with varying mechanization capabilities, BellSouth also is prepared to accept verbal trouble reports.

Q. Please describe the currently available real-time, interactive, electronic interface for trouble reporting.

A. BellSouth has offered ALECs the same electronic interface for trouble reporting that is now available to IXCs for access services. This

interface allows the ALEC to enter a trouble report, obtain the same appointment interval that would be given to a BellSouth end user customer, subsequently add information to the report itself, check for trouble completion, cancel the trouble report if necessary and perform other trouble administration functions. In response to troubles reported via the gateway, BellSouth will test and initiate repair to the service.

The similarities between this arrangement and the electronic trouble reporting available for access customers are shown in the figure filed with this testimony as Attachment GC-5. This interface was implemented by BellSouth in 1995 for access services, at AT&T's request. This interface is based on national standards published by the American National Standards Institute (ANSI) and was implemented in accordance with industry guidelines. The ANSI standard defines the transfer of maintenance requests, status and closeout information between two telecommunications providers.

Q. Please describe the additional capabilities being added to the existing electronic trouble reporting interface.

A. At AT&T's request, BellSouth is adding the capability for the ALEC to access the same interactive testing sequence that BellSouth follows to screen trouble reports.

Q When will this enhancement be available?

A This enhancement is scheduled for completion in March of 1997.

Q Is this an aggressive schedule?

A. Yes, it is. This system was not originally built for external access. Therefore, extensive modifications are required in order to maintain the security and integrity of the system. BellSouth is not internally staffed for this development effort. Therefore, after defining the technical specifications for the interface, BellSouth must acquire external programming resources for an effort that will require thousands of programmer hours. In addition, the preliminary architecture will require BellSouth to purchase and install a new computer platform to establish connectivity with the external users of this system.

Q. What is the estimated cost of providing this enhancement?

A. Current estimates are that this interface will cost BellSouth approximately $3.5 million to develop and implement. Actual cost will be determined as the implementation proceeds.

Q. Please summarize your testimony on electronic interfaces for trouble reporting.

A AT&T's assertion that BellSouth is unwilling to provide a real-time, interactive, electronic trouble reporting interface is simply not true BellSouth has already provided such an interface In addition, at AT&T's request, BellSouth has a time-consuming and costly effort underway to provide additional interactive trouble reporting capabilities to ALECs.

Electronic Interfaces for Customer Usage Data Transfer

Q In its petition, AT&T claims that BellSouth has been unwilling to make an electronic interface available for customer usage data transfer Is this true?

A. No, it is not true. BellSouth already has the capability available to electronically provide customer usage detail to ALECs. This option provides detail for billable usage such as directory assistance or toll calls associated with a resold line or a ported telephone number. The usage option allows the ALEC to bill end users at their discretion, rather than on BellSouth's billing cycles. This option also allows an ALEC to establish toll limits, detect fraudulent calling, or analyze its customer usage patterns.

Q. How long has BellSouth had this electronic interface available?

Tab C-10

3 1 BACKGROUND

To better appreciate what TAFI does to enhance your ability to exceed your customer's expectations, let's take a minute to review the trouble resolution process before the introduction of this new system.

Customers reported their problems to the (old) Centralized Repair Service Attendants Bureau (CRSAB) at BellSouth where a Repair Service Attendant (RSA) input the customer's information into the LMOS system. The RSA then informed the customer that the problem would be resolved by the commitment date/time and that someone else would be contacting them.

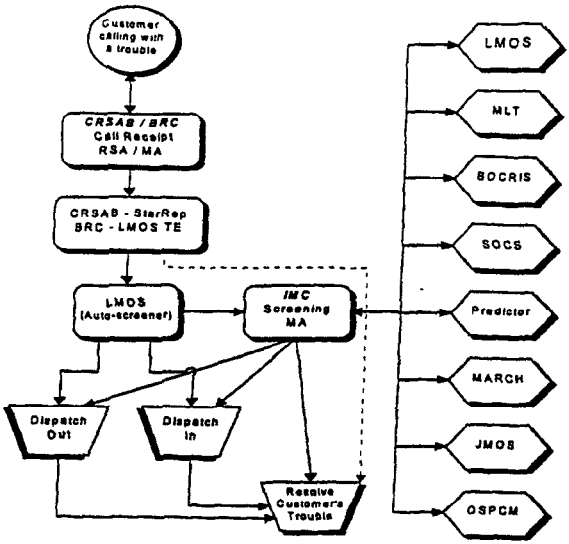
The trouble report would then flow to the LMOS "auto-screener" (software package) to see if the system could determine where to send the report. This auto-screener had limited capabilities and could identify only obvious situations. (i.e., If the MLT test indicated that the line was open and the customer was reporting "No Dial Tone," the auto-screener package would route the report for a field technician to be dispatched.)

Reports that could not be handled by the auto-screener program were then routed to the "screener" position in the Installation Maintenance Center (IMC). The screener (a Maintenan Administrator - MA) accessed a number of downstream systems to manually analyze the situation and correct the problem (if it could be "remotely" repaired) or determined where the report needed to go for resolution.

This MA needed to (1) know which downstream system to use (i.e., there are 16 different Predictor systems in BellSouth), (2) possess the experience to analyze the information gathered and (3) provide consistent resolutions and/or recommendations as to where to send the problem.

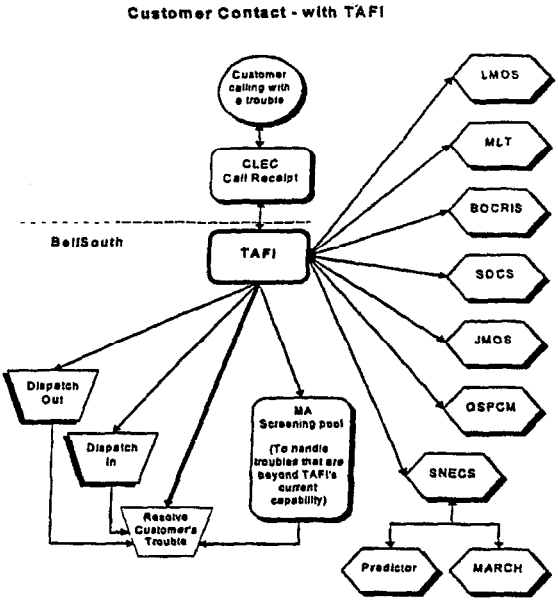
With the introduction of a system called StarRep (1992), the RSA was provided the capability to perform some very basic trouble resolution functions. The TAFI system was built on these early initiatives to become the system used today in the RRC and BRC.

Customer Contact - pre TAFI



With the introduction of TAFI, the person handling the initial customer contact will resolve all POTS trouble conditions (for those troubles that can be cleared remotely) or route the trouble report to the correct entity for resolution. In other words, the functions performed by the MA in the IMC are now completed by the TAFI user on the initial contact.

This task was accomplished by developing a 'tool' that performs the mechanics of accurately processing the customers' trouble situations. TAFI actually accesses all of the downstream systems, gathers appropriate data, performs specific Central Office translation changes and provides the user with a recommendation / resolution to the problem condition.



3.2 A WORD ABOUT TAFI 'WINDOWS'

The user should be familiar with the characteristics of 'traditional' windows as seen in Microsoft Windows on a PC and on an X-Window LAN terminal. All of these windows include a title bar, the user can move them around the screen, the user can jump from one window to another, change their size, shrink them into icons, etc.

The term "window" has a different meaning in the TAFI application. TAFI was designed to be accessible from a number of different terminal types - everything from a sophisticated X-Window terminal to a simple ASCII terminal like a VT220. Therefore, the TAFI application does not support a Graphical User Interface (GUI). In other words, once you log into TAFI and use your mouse to move the TAFI screen to where you like it to be, you will not use the mouse to use TAFI.

8.0 ADDITIONAL DATA WINDOW

TAFI gathers much information from a number of downstream systems during the processing of a trouble report. During the normal flow, TAFI uses this information to develop its recommendation. However, there may be times when you may want to view this information to gain a better insight to a specific problem. This information is found in the "Additional Data Window" and is accessible by depressing F11.

⇒ **Note:** The Additional Data Window is only available if you are processing a trouble report ... because without a telephone number to work on, TAFI doesn't gather any "data".

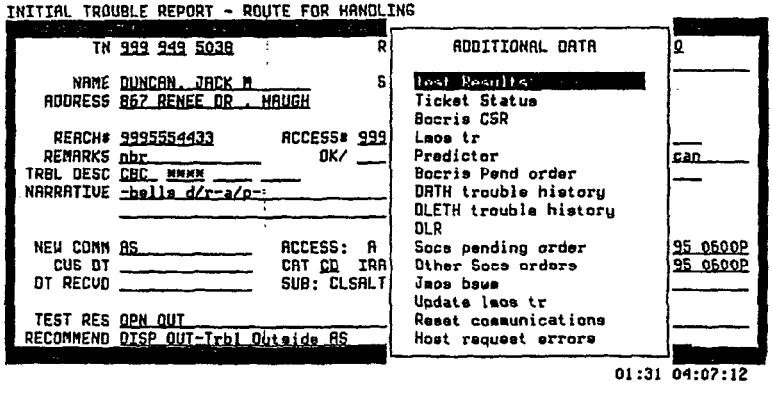
The Additional Data Window displays the following menu of options:

Test Results	displays the MLT results obtained by TAFI
Ticket Status	LMOS Recent Status Transaction (RST) - used to view the various lines of status on a pending trouble report
BOCRIS CSR	CRIS Customer Service Record - displays the products and services that are programmed on the line
LMOS TR	LMOS Trouble Report - a view of TAFI's interaction with the LMOS TR mask
Predictor	Predictor - the results of TAFI's inquire to Predictor
BOCRIS Pend Order	BOCRIS Pending Service Order - a view of what was ordered in BOCRIS
DATH Trouble History	LMOS Display Abbreviated Trouble History - A trouble history report showing just the close out narrative on previous trouble reports
DLETH Trouble History	LMOS Display Extended Trouble History - A trouble history report showing every line of status on previous trouble reports
DLR	LMOS Display Line Record - displays the customer's Line Record in LMOS
SOCS Pending Order	Service Order Communications System - displays the status of a pending service order
Other SOCS Orders	If the customer has more than one pending service order, this option lets you select which service order to view

JMOS BSWM	JMOS Buried Service Wire - displays the status of work orders to bury customer's buried drop wires. (This work is performed by contractor.)
LMOS TR Update	If the trouble report is updating an existing LMOS report, you can view this update here
Reset Communications	If you get a "communications error" (i.e., Comm Error LMOS-A) you can actually reset the communications link between TAFI and the downstream system used by your session using this option
Host Request Errors	If TAFI attempted to gather some information or send some information and the request failed (due to either a communications problem or the host system was not available), you can re-send the transaction with this option

Most of these options produce reports that have more than one page. You may scroll through each page using the **Page Up** and **Page Down** keys.

With an active trouble report on your screen, depressing F11 produces the "Additional Data Window"



Tab C-11

Bradbury,J M (Jay) - LGA

From. jshill@att com
Sent: Friday, December 18, 1998 4 21 PM
To: bradbury@att com
Subject: FW Notes EC Gateway - Local

MLT

From Eugene Piatkowski [SMTP Eugene Piatkowski@bridge bst bls com]
<mailto [SMTP Eugene Piatkowski@bridge bst bls com]>
Sent May 16, 1997 03 28 PM
To Hill, Jim
Cc Maria W Mayo, Linda W Tate
Subject Notes EC Gateway - Local

Jim,

Attached is a revised draft of the notes addressing issues raised in our February meeting We discussed these items last week and this document updates our replies
There is one or two open issues we are still working on and will provide you the answers early next week (i e , how many status entries on a typical report?)
Thanks,
Gene

---------- Attachment ----------

****

The following Microsoft Word For Windows V6 document is uuencoded You may use the UNIX uudecode utility to translate it to its native format
****

---------- Attachment ----------

<<ECG_LOC2 DOC>>

Notes From AT&T/BellSouth EC-Gateway Local Meetings —2/26/97, 2/27/97, 5/8/97 & 5/9/97

List below is an updated summary of items impacting the development of the EC Gateway for Local Competition discussed at the meetings between AT&T and BellSouth.

Key	For each **Attribute**:
	The first section represents AT&T's view/request
	The second section represents BST's interpretation / answer

Attributes

Activity Duration: AT&T will accept all values for Activity Type and would like to receive billing information in this attribute We need to look at this to see if this use would be consistent with the contract and to see if BellSouth can support this use

~~Billing information is being investigated at BST~~ The issue arises when the technician is performing a maintenance function and the customer is not covered by a maintenance contract This billing falls into a "manual process" and the amount of the charges will not show up on the LMOS trouble report when the ticket is closed However, a Disposition Code will tell alert AT&T that a bill was rendered The actual amount of the bill is processed by the LCSC and is not part of the LMOS record

BST will provide a sample of how this billing statement will look

Additional Trouble Info List: LMOS currently supports a 50 character narrative BellSouth will look at this to see if they can support more Each time AT&T sends this attribute, it will be a replacement BellSouth will treat as additive We need to look at this

~~This requires additional investigation by BST~~ The narrative field length in BST's LMOSsystem is limited to 100 characters A number of required entries currently populate this field and care must be observed not to displace required data Therefore, will need to prioritize what info is populated in the narrative field (anttcipate 50 characters available)

Items currently populated in the narrative include (1) CLEC name (limit to 4 characters - ATT) (2) Access telephone number information (ACN=XXXYYYZZZZ) and (3) narrative information related to the trouble condition (Note, when the user sends the 'TR' transaction, (4) LMOS places the Trouble Description Code(s) as the 'first thing' in the narrative There could be up to four sets of four characters (minimum of two) i e , NDT OOSY BKDT If a report is backdated (BKDT), (5) the reason for the backdate is in the narrative as a code (i e , BK04) (Note BST is evaluating on standardizing the CLEC name going in the "Remarks" field to free up narrative room.)

As subsequent reports are taken and new information supplied, one must ensure that information needed to repair the trouble is not lost Typically, 'new' information is inserted first followed by the old information

Notes From AT&T/BellSouth EC-Gateway Local Meetings
—2/26/97, 2/27/97, 5/8/97 & 5/9/97

Notes From AT&T/BellSouth EC-Gateway Local Meetings —2/26/97, 2/27/97, 5/8/97 & 5/9/97

Additional Trouble Status Info.: BellSouth does not currently support Estimated Repair Time and will look at this to see if they can support it BellSouth will include MLT results in this attribute on a create response They will determine if they can supply full results or just verification code and description

ETTR is the same as commitment time in BST. This time indicates that the trouble will be fixedNO-LATER-THAN the commitment time indicated (In the current EC Gateway, for LMOS, BST sends back commitment time as the ETTR) BST can provide the VER Code for the MLT test

At this time BST cannot provide additional information on the MLT test results and meet the October deployment schedule BST is investigating how to provide full MLT results (as an AVC) as an enhancement in early 1998

The commitment time on the LMOS record is the correct commitment to give the end user There are only two exceptions to this rule giving the customer a shorter commitment time (1) if the customer has a defined 'emergency' (i e , Dr on call) then the 3 clock hour emergency commitment is allowed and (2) if the customer restricts access to the property (for a report that requires a premises visit) prior to the established commitment time, the "B" time then becomes the commitment (Note BST will monitor % reports where initial commitments change and compare CLEC usage against BST usage Corrective actions will be taken to correct misuse of commitment settings)

Agent Contact Person: BellSouth will supply a center name and phone number (10 digit)

~~*BST will determine if 15 characters can be supported*~~*The Gateway can maintain a table of contact names and telephone numbers to return on each report (currently the WMC supervisor) Once BST deploys the LCAC (functionally similar to ACAC for local competition), the LCAC supervisor will function as the single point of contact*

A Location Access Address: BellSouth will check if this attribute is updatable AT&T would like capability to update via a Modify BellSouth stores 17 characters from Civic Address, City, and State BellSouth will use their own address BellSouth will check to see if they can compare their address against the address supplied by AT&T and inform AT&T if their is a significant mismatch

~~*BST Gateway can accept a create request when the aloc address does not match BellSouth's database. BST uses BST's address. This issue of sending back an AVC if the address does not match will have to be investigated by the BST work center. Today, AVC's containing updated Aloc Address information is not sent back to the CLEC or IXC.*~~*BST will provide LMOS address - if AT&T determines incorrect, they can send update If LMOS name or address data mismatches AT&T data, updated information goes in the narrative field as follows*
*LN-***Joe Smith**, *LA-***123 S. Main St.** *(i e , The customer name and address fields require a database update to correct errors (manual intervention) and is not directly updatable as AT&T's system is)*

Notes From AT&T/BellSouth EC-Gateway Local Meetings —2/26/97, 2/27/97, 5/8/97 & 5/9/97

A Location Access Hours: BellSouth stores only the current day in LMOS BellSouth will only dispatch 30 minutes before access is available according to this attribute AT&T will look at this

BST will populate current commitment If AT&T sends dates outside of offered commitment, and provides access hours, the report will be available for dispatch-out 30 minutes before the "A" (after) time on the commitment date Reports that do not require the dispatch of a field technician are not impacted by the access hour window and will be worked as they become available via the MSCR (mechanized screener function)

A Location Access Hours are populated in the "A" and "B" field on the LMOS TR screen These fields (A/B) should only be populated when a premises visit is required to fix a trouble and access to the network interface is restricted to specific times BST will store and appropriately react to these access hours ~~remarks~~ - but can not store seven days worth

A Location Access Person: There is an issue as to the Person Name length BellSouth can support

~~Today, BST stores up to 7 characters.~~ This is constrained by the 100 char maximum in the narrative field in LMOS BST/AT&T Need to prioritize what is populated in the narrative field A location access person will be placed in the narrative as long as trouble information is not compromised (i e , 'see Joe').

Authorization List: Can BellSouth support "denied"? They will check Does AT&T need to supply authorization on a Create? Jim Hill will check the contract BellSouth will need to request "no access" time in order to subtract it from outage duration

Once a trouble ticket is submitted, the customer (AT&T) has agreed to BellSouth performing work necessary to repair trouble LMOS does not accept authorization prior to dispatch or taking line out of service to repair the trouble The gateway will support authorization denied attribute, and will not reject the transaction (causing the "set or create ticket" to fail)

Called Number: This is not a current field in LMOS BellSouth will store in the narrative

Correction The Called Number field is supported in BST's LMOS system

Cancel Requested By Manager: BellSouth will check to see how they would handle a Cancel with work in progress

~~BST is concerned of the work that is progress when a cancel is received.~~ A cCancel request will be accepted by the Gateway and sent ~~to into the narrative field in~~ LMOS as a subsequent report If IST value (status) of report is DPO (dispatched out), the report can not be closed If not DPO (i e , PDO - pending

dispatch out), then report can be closed appropriately ~~The CAS technician, if dispatched, may not receive the notification, therefore, the cancel is void.~~ BST would have~~will~~ incurred a cost for this repair attempt and may charge AT&T appropriately for the repair service.

Close Out Narrative: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Close out for LMOS tickets do not follow WFA Ticket will be closed without the verify process (originator does not verify fix before close of ticket) The close out narrative, as provided by the LMOS FST transaction, will be provided Note There will be an AVC indicating when the report was 'cleared' along with the associated narrative The 'close' status could come later and the "type", "cause" and "disposition" codes are only available on the close AVC

Commitment Time: BellSouth will send a "trouble resolved" time in Cleared Time We discussed jeopardy condition and possible escalation if BellSouth can not meet AT&T commitment time request

BST establishes commitment time This is the same as ETTR LMOS assigns commitment based upon internal algorithms and will set that time M&P's will identify how to handle "priority lines" (i e doctor, etc ~~etc~~) and emergency situations

Commitment Time Request: BellSouth Gateway accepts this attribute but does not send it to LMOS LMOS determines Commitment Time based on internal algorithm See Commitment Time for discussion of jeopardy

Customer Trouble Ticket Number: BellSouth will check to see if it can support 15 characters

Not needed for LMOS - for POTS , the telephone # is ticket #

Escalation List: AT&T needs BellSouth to identify how many levels of escalation it recognizes BellSouth stores escalation information in the narrative BellSouth will look at how it will support escalations

BST will provide M&P's in JIA to handle this manually (i e , Automatic escalation levels not supported within LMOS Until BST misses the commitment time, there is nothing to escalate Should the commitment be missed due to BST failure (i e , not No Accessed, pending facilities, etc) a subsequent report is generated with a new commitment value of 5 minutes from clock time This action puts this missed commitment report on the top of the work list for attention)

Maintenance of Service Charge: This is a billing issue Jim Hill will check if there is a fixed charge in the contract BellSouth will check how they could support this attribute

~~*Billing Issue needs to be investigated by BST for long-term solution. Tech will show what was billed and not show T&M.*~~
Techs show that a bill was issued period (by disposition code) on the close out AVC Details of billing come from LCSC

Managed Object Access Hours: BellSouth needs to think about this attribute and determine if and how they can support it.

Request to repair marginal service after normal working hours (i e , don't swap cable pairs thereby taking the line out of service for some interval of time) is handled with a notation in the narrative

Managed Object Instance: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Attribute supported in the gateway

Manager Contact Person: BellSouth can support a Person Name of 20 characters and a Person Phone of 10 digits

The Person Name will be populated in the LMOS 'Remarks' field and the Person Phone will be populated in the 'Reach Number' field

Outage Duration: "No access" time will be subtracted from Outage Duration BellSouth will need to request "no access" time

BST will not request "No Access", it will report "No Access" Technician in field cannot communicate with the ECG interactively, status is via LMOS IST transaction

Outage duration is computed as the interval between receipt and clear time minus any no access time The no access period is computed as the time between when the report was statused no access and when it became available for action (i e , subsequent report statusing ticket PDO)

Perceived Trouble Severity: BellSouth will determine "out of service" and "service affecting" conditions from this attribute.

Notes From AT&T/BellSouth EC-Gateway Local Meetings —2/26/97, 2/27/97, 5/8/97 & 5/9/97

Based upon the current ECG, if the perceived trouble severity is a 0, it is labeled "out of service" This is part of BST/LMOS's algorithm for ETTR/commitment time calculation Conditions for this attribute (to determine commitment time) differ from state to state and depend upon work load, technician's location, date/time of notification of trouble

Out of Service (OS) is generally defined as the complete inability to make or receive calls (i e , NDT on all phones, CBC) If not OS, then report is marked as Affecting Service (AS) A definition of out of service based upon LMOS 'type' code and MLT VER codes will be provided in the JIA

Received Time: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Repeat Report: BellSouth supports "repeat" and "chronic" (3 or more trouble reports in 30 days) for POTS

A repeat report is defined as a second trouble reported within 30 days of closing a prior report BST LMOS system does not support (automatically flag) 'Chronic' reports

Restored Time: BellSouth will use "cleared" time from LMOS

Trouble Clearance Person: BellSouth can support a Person Name of 20 characters and a Person Phone of 10 digits

Maria: is this attribute something AT&T provides us (since I had a note saying 'same as manager contact person') or is it something AT&T is expecting from BST (who cleared the trouble)??

[The identifier of who cleared the trouble is found as the CUID (Common User ID) contained on close out - not name in close out narrative name (could be done electronic system ID) Clearance person telephone number not supported BST could provide the center contact person/telephone number]

Trouble Found: Need to map BellSouth LMOS codes to T1 227 values in JIA

Data provided in JIA

Trouble Report Format Object Pointer: AT&T will always use TRFD 1

Trouble Report ID: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document.

Trouble Report State: BellSouth will support the list of Trouble Report State/Trouble Report Status values supplied by AT&T.

BST will provide AT&T with list of IST values used on trouble reports in JIA

Trouble Report Status: BellSouth will support the list of Trouble Report State/Trouble Report Status values supplied by AT&T

Same as above

Trouble Report Status Time: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

IST transactions from LMOS contain both the Status time and IST values

Trouble Report Status Window: BellSouth and AT&T agree that BellSouth will support this attribute based on the description as it is in the AT&T Requirements document

Based upon no auto-escalation in LMOS, this is supported in the gateway and not used in LMOS. This window will be used to determine if a ticket has been closed in LMOS and needs closure in the GW

Trouble Type: Need to map BellSouth LMOS codes to TI 227 values in JIA BellSouth will reject unknown codes

Gateway will be updated for additional values

TSP Priority: BellSouth will use their own value BellSouth will look at what happens if the value supplied by AT&T does not match their value

The appropriate TSP values are loaded in LMOS for select lines Based upon TSP value, additional weightings (prioritization for repair activity) and provided in LMOS to ensure appropriate responses Differences in TSP values (for a given end-user) will have to be resolved manually Disaster # defined by application to Fed Government Handled same as BST

Functions

Enter Trouble Report (Create): LMOS may have a problem with tickets that were manually entered (fall back reporting) that is bonded later BellSouth will look at this issue

Manual tickets will remain manual through the life of the ticket BST does not support ticket recovery in LMOS - Tickets cannot be electronically bonded in the gateway if it was manually created Ticket would

have to be closed in LMOS and re-enter the ticket electronically to bond it However, this practice would negatively distort BST's performance statistics (i e , repeat report rate would go up)

Cancel Trouble Report: BellSouth needs to determine how they wish to handle a cancel after a dispatch

If the ticket is dispatched out, the ticket cannot be canceled~~cancelled~~ The cancel request will be sent to LMOS (as a subsequent report) and placed in the narrative field

BellSouth and AT&T agreed that BellSouth will support all other functions based on the function descriptions in the AT&T Requirements document.

Other Items

1 Every time a BellSouth person makes a narrative change in LMOS, BellSouth will send AT&T and AVC BellSouth and AT&T will look at this issue

Currently, there is no way to determine what AVC's to send to AT&T BST conducting a study to determine the average number of status entries per report and this issue may become moot

2 BellSouth will look at attributes for Local Number Portability and Location Routing Number

Need clarification on this issue Do not have this issue in notes Trent will review his notes and resubmit the question BST has developed strategies to address LNP opportunities and reports of this nature would be properly handled once in LMOS

3 Must Generalized Time always be in GMT (Zulu time) AT&T does not think so and is planning to use local time for several attributes AT&T (Trent Di Renna) will look into this issue

BST LMOS records in 'local' time where the report is located If required, EC Gateway will make the translations.

4 Can AT&T do a query after a Trouble Report is closed? Does AT&T want to do this? AT&T and BellSouth will check

BST Gateway supports GETS for closed tickets The EC Gateway maintains history data for seven days and this seems to satisfy AT&T's request

5 Will we use X 25?

BST can support X.25 or CMIP over TCP/IP over a private line.

6 What type of testing will we perform This will be determined

Begin Stack-Stack on 8/15, Gateway-Gateway on 8/22, End-End on 9/22, Operations Ready Test on 10/10 and Begin Beta on 10/15/97

7 Can AT&T OSS handle Trouble Reports on circuits not identified by a telephone number AT&T will check Is this an issue?

ECG can handle designed/complex & non-designed circuit troubles (identical interface to WFA as used in IXC Gateway) If AT&T can't generate electronically, these will have to be called in to the BST work center

Tab C-12

Actiview - TAFI
Capability / Functionality Comparison

Features/Functions	TAFI	Actiview + TAFI	Actiview Standard Process	Actiview with Electronic Bonding
Trouble Referral Method	Electronic	Electronic	***Phone Call***	Electronic EBI Standard
Supports POTS	Yes	Yes	Yes	Yes
Supports Spec ckts	***No***	***Rel 11.0 (12/15/97)***	***Rel 11.0 (12/15/97)***	***Rel 11.0 (12/15/97)***
Get Cust records	Yes	Yes (AV & TAFI)	Yes	Yes
Get Tbl status	Yes	Yes (TAFI)	***Verbal***	Yes
Get Tbl history	Yes	Yes (AV & TAFI)	Yes	Yes
Get Cust features	Yes	Yes (AV & TAFI)	Yes	Yes
View Pending Work Orders	Yes	Yes (AV & TAFI)	Yes	Yes
Enables correction of cust features	Yes	Yes (TAFI)	Yes	Yes
Enables PIC vfy	Yes	Yes (TAFI)	***Verbal***	***Yes****
Enables Line test	Yes	Yes (TAFI)	Yes	Yes
View MLT test rslts	Yes	Yes (TAFI)	***Verbal***	Yes
ETTR fm LSP	Yes	Yes (TAFI)	***Verbal***	Yes
Compatible w/ National and Regulatory Metrics Reporting	***No***	***Yes (AV)***	***Yes***	***Yes***
Query Tbl status	Yes	Yes (TAFI)	Verbal	Yes
National Standard	***No***	***No***	***No***	***Yes***
Quantity of Agent Inputs Required	1	2	1 AT&T 1 LSP	1
Additional Training required	Yes	Yes	No	No

1997 Incremental Cost Comparison

	TAFI	Actiview + TAFI	Actiview Standard Process	Actiview with Electronic Bonding
Hardware/Software	+ $50,000	+ $50,000	$0	$0
Process / M&Ps	+ $8,000 (est)	+ $8,000 (est)	$0	$0
Training	+ $8,000 (est)	+ $8,000 (est)	$0	$0
CNSC Personnel (Fixed & Variable)	+ $126,000 - $323,000	+ $126,000 - $323,000	$0	-0 8 agents/ $9,000
Total	**+ $192,000 - $389,000**	**+ $192,000 - $389,000**	**$0**	**-$9,000**

- Volume of customers is approximately 150,000 at year 1997 Current YTD national defect rate is 3.49%.

Customer Experience (Interval) Comparison

	TAFI	Actiview + TAFI	Actiview Standard Process	Actiview with Electronic Bonding
Take Incoming Call	5 min	75 min	.25 min.	.25 min
Get & Vfy Customer Records	5 min	1.25 min	75 min	75 min
Determine Preliminary Diagnosis	2.5 min	5 - 6 min	4 -5 min	4 - 5 min
Create Cust Trouble Ticket	5 min	3 5 - 4.5 min	3 - 4 min	3 - 4 min
ETTR given to customer	.25 min	.25 min	.25 min	.25 min
Create Work Order & refer to BST	.25 min	8.25 min	8.0 - 12 min	5 min
MLT Test Run	Background	Background	Background	Background
Update WO w/ BellSouth Close-Out and Repair Info	.5-1.0 min	5 - 5 5 min	4.5 min	5 min
CNSC contacts customer	5 min	5 min	5 min	5 min
CNSC completes and closes CTT	N/A	3.5 min	3.5 min	N/A
Total time (approximate)	10 - 11 min	32.5 - 35 min	29.25 - 35.25 min	14.25 - 16.25 min

Other Considerations

- Impact on the Customer Connectivity National Architecture for OSS and LEC interface needs to be understood.
- BST does not guarantee to continue existing functionality in future.
- Requires customer to select additional voice prompt to route to the BST / TAFI pit in CNSC
- TAFI does not allow trouble referral to IW vendor
- Additional resources needed to do TAFI Sys Admin in CNSC, on-going M&P development & training.
- Requirement to feed BU and Regulatory entities via Actiview, not provided through TAFI (TAFI feeds BellSouth LMOS system where BellSouth reports are derived)

TAFI vs EBI

- TAFI, as described, provides a 30% interval improvement over EBI (4 5 minute)
- TAFI costs $192,000 - $389,000 additional to introduce into CNSC
- TAFI does not provide CMD, BMD and Regulatory reporting requirements Those currently are
  - *Speed of Answer - CNSC (Metric reflects the speed of answer for call rcpt in CNSC)
  - *Abandonment Rate - CNSC (Metric reflects the percent of customer calls abandoned)
  - Center Availability - CNSC (Metric reflects the center availability for call rcpt)
  - *Appointments Met (Metric reflects the percentage of ETTR commitments met)
  - *Time to Restore (Metric reflects the Local Service Providers time to restore)
  - *Repeat Troubles (Metric reflects percentage of repeat troubles for CMD / TSR mkt)
  - Resolution Code Analysis (Metric reflects the resolution code analysis for CMD / TSR mkt)
  - Misdirected Telephone Calls (Metric reflects percentage of misdirected calls into CNSC)
  - *Defect Rate (Metric reflects the defect rate per 100 access lines for CMD / TSR mkt)
  - End to End results
- * Indicates PUC and or FCC requirement. (SR/AV must provide metrics for all states)

Tab C-13

July 21, 1997

Mr Robert Echols
BellSouth Telecommunications Inc
1960 West Exchange Place
Tucker, Georgia 30084

Dear Robert·

I am writing you to provide you with AT&T's decision on using BellSouth's TAFI system as an interim maintenance process.

First, let me thank you for providing training to AT&T personnel in May The training was very informative and aided our analysis of the TAFI system Additionally the support in providing documentation and answering our questions about TAFI was invaluable to our analysis.

After considerable consideration and based on the inputs provided, AT&T has decide not to use TAFI at this time. Since AT&T's plan is to utilize Electronic Bonding Interface "EBI" on a long term basis, and since under AT&T's and BellSouth's agreements the interim period until EBI is operational is of short duration, AT&T does not believe that it is an efficient use of resources to convert to TAFI for such a short time frame

It is important that we now focus on having the EBI process operational by 11/15/97, and work toward getting interface agreements in place for the current process We look forward to working with BellSouth on these efforts. Please call me at 404 810-8283 if you have any questions.

Sincerely,

Vincent Doran

cc: Pam Nelson
Robert Oakes
Scott Martin
Bob Benson
Arthur Defee

Tab C-14

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF WILLIAM N. STACY

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

DOCKET 8354-U

MARCH 6, 1998

Q PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.

A My name is William N. Stacy. I am employed by BellSouth Telecommunications, Inc (BellSouth). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am the Assistant Vice President - Services for the Interconnection Operations department of BellSouth Telecommunications, Inc. (BST) In this position, I am responsible for development of the procedures used by BST personnel to process Competitive Local Exchange Carrier (CLEC) service requests, and for assisting the service centers in Interconnection Operations in implementing CLEC contracts in a manner consistent with State Commissions and the Federal Communications Commission (FCC) rules and regulations governing local exchange competition. I have held numerous positions with BST in Network Engineering, Operator Services, Network Planning and Network Operations.

Q. ARE YOU THE SAME WILLIAM STACY WHO PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

1998. The rejects documentation also was provided to CLECs during the October 30-31, 1997 conference and was produced as an exhibit during an OSS proceeding before the Alabama Public Service Commission; it was also included in the January 30, 1998 edits package sent to the CLECs The SOER edits were also a part of this edits package distributed on January 30, 1998. (All of these documents were included as Exhibit WNS-2a-d of my direct testimony.) Ms Closz acknowledged that Sprint received all of this documentation, but complains that Sprint has not had time to review it. To the contrary, Sprint has had plenty of time to review the rejects document, which it received on Oct. 30 If Sprint feels it is unable to move forward with interface development, the fault is not BellSouth's.

The business rule information for version 7.0 of EDI and the technical specifications for the interface which are based on OBF have been provided to the CLECs (via their joint implementation teams) that are developing interfaces for version 7.0.

ISSUES DEALING WITH MAINTENANCE AND REPAIR FUNCTIONS

Q WHAT IS THE STATUS OF THE EBI/ECTA (ELECTRONIC COMMUNICATION/TROUBLE ADMINISTRATION) INTERFACE WHICH AT&T REQUESTED BELLSOUTH BUILD?

A. BellSouth completed its development of the ECTA by November 15, 1997, as required by AT&T. Since that time for more than three months, AT&T has continually delayed the implementation of ECTA due to problems with their side of the interface. AT&T has requested weekly delays since the first date change to February 2, 1998. ECTA's current implementation date is March 9, 1998, but that may also be delayed again by AT&T

Q. MR BRADBURY PROPOSES THAT BELLSOUTH BE REQUIRED TO PROVIDE ACCESS TO TAFI FUNCTIONALITY THROUGH THE EBI INTERFACES. DO YOU AGREE?

A. No Mr. Bradbury is confusing AT&T's desired business solution for their maintenance and repair functions with BellSouth's requirements to provide parity of access to this functionality for the CLECs. BellSouth retail units utilize TAFI as their primary tool for managing maintenance and repair functions. BellSouth has provided this same interface for the CLECs.

AT&T's request recognizes that TAFI is superior to the national standard EBI interface, and that adding TAFI's functionality to EBI is a goal worth pursuing, and I agree However, this is additional functionality over and above BellSouth's legal requirements.

RETAIL RATES ON CSRS

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:	
INVESTIGATION INTO DEVELOPMENT OF ELECTRONIC INTERFACES FOR BELLSOUTH'S OPERATIONAL SUPPORT SYSTEMS	Docket No. 8354-U

Room 507
47 Trinity Avenue
Atlanta, Georgia

Wednesday, March 18, 1998

The above-entitled matter came on for hearing pursuant to Notice at 10:07 a.m.

BEFORE:

MAC BARBER, Chairman
ROBERT BAKER, Commissioner
DAVID BAKER, Commissioner

* * *

Brandenburg & Hasty
231 Fairview Road
Ellenwood, Georgia 30049

Q Fair enough. On page 40 of your rebuttal testimony --

A Yes.

Q -- you state at the bottom regarding TAFI that you agree with Mr. Bradbury that adding TAFI functionality to EBI is a goal worth pursuing, is that correct?

A That's correct.

Q Were you aware that AT&T has been requesting access to TAFI through EBI interface since practically April of 1996?

A I will take that subject to check. It's been a number of months, yes.

Q When will BellSouth be able to provide TAFI functionality through EBI interface?

A At the moment I can't give you a definite answer. Whenever BellSouth, AT&T and the standards committee can agree on the transactions to be implemented over that interface, providing it on the BellSouth side of the interface is not nearly as difficult as figuring out what data we're going to send back and forth over the interface. I honestly don't have a good date for that.

Q Is there any reason why BellSouth has to wait -- Well, BellSouth and CLECs in the southern region, in the southern part of the country have to wait for the standards body to rule on this or could they agree on it themselves?

A The reason they are actually -- let me answer your question in two parts. One there are some reasons to go ahead and there are some reasons to wait. The reasons to go ahead would be to get to functionality as early as possible. The reasons to wait are that we do coding, which then is not compliant with, for instance, how MLT queries are to be sent back and forth over that interface and then we all have to recode again next year or later this year, whenever the standard comes out. There are arguments on both sides.

Tab C-15

AT&T

Pamela A Nelson

Room 12N54
1200 Peachtree St NE
Atlanta GA 30309
404 810-3100

April 9, 1998

Ms Jan M Burriss
BellSouth Interconnection Services
1960 West Exchange Place, Suite 200
Tucker Georgia 30084

Dear Jan

This is to advise you that effective immediately, AT&T is suspending implementation and deployment of the Maintenance Electronic Bonding Interface ("EBI")

Because the EBI interface requires significant transaction volumes for it to be cost-effective and because such volumes are unattainable given our inability to get the form of interconnection we need, we are discontinuing its implementation AT&T has previously stated that we cannot continue to pursue entry via resale because it is not a financially viable option AT&T also has been foreclosed from offering local exchange service via the UNE Platform because BellSouth has refused to make the platform available In addition, information we have been provided by BellSouth indicates that local service using UNEs will be designed as private line circuits That being the case, it is unclear whether the EBI interface is usable in a UNE environment Until its utility in that environment is clear, it is not prudent to continue expenditures for its development

In light of the suspension of this EBI capability, BellSouth and AT&T need to maintain the existing manual arrangements to provide repair and maintenance services for any current AT&T local service customers We appreciate your cooperation in maintaining those arrangements

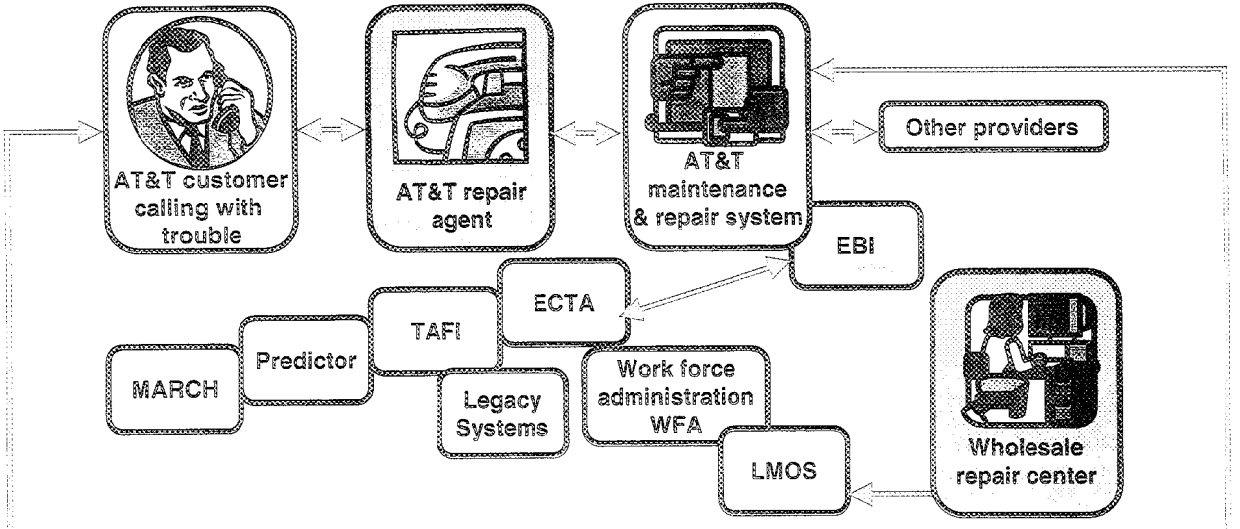
AT&T remains committed to entering local exchange markets where appropriate conditions exist and will obviously need to implement maintenance and repair interfaces to support such entry When the appropriate conditions exist, AT&T will resume its development and implementation of the maintenance and repair interface

Sincerely,

Pam Nelson /tl

cc Ray Crafton
Michelle Augier

Integrated maintenance process with BellSouth



Product - local / LD / wireless / video / internet / data
Provider - ILEC / CAP / other / AT&T
Local connectivity option - resale / UNE interconnection

AT&T internal databases and OSS

- Customer service information
- Customer problem information
- Trouble report information *(current & historical)*
- Facility and equipment information
- Customer billing information

Federal Communications Commission
Washington, D.C. 20554

February 10, 1999

Mr. Sid Boren
Executive Staff Officer
BellSouth Corporation
1155 Peachtree St., N.E., Room 2004
Atlanta, GA 30309

Dear Mr. Boren:

On December 15, 1998, members of the Common Carrier Bureau Staff ("Bureau Staff") met with representatives of BellSouth to discuss interpretations of the Commission's October 13, 1998, BellSouth *Louisiana II* Order as it might be applied in other states in which section 271 applications might be filed.[1] A summary of the discussion is described below. The Bureau Staff indicated that additional information from BellSouth and interested parties would be useful in order for the Bureau Staff to engage in further discussion. The Bureau Staff also indicated that its views were based on information developed since the issuance of the BellSouth *Louisiana II* order. The Bureau Staff stated that its views on any of these issues were in no way binding on the Commission, and that no conclusive determination could be made outside the context of an actual Section 271 application and record.

1. **Flow-Through.**

Issue. Whether BellSouth can exclude complex orders from its flow-through calculations and what level of disaggregation of flow-through is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response. The Bureau Staff stated its view that, in principle, complex orders that are manually processed for BellSouth's retail customers could be excluded from flow-through calculations. The Bureau Staff also stated its view that, to the extent BellSouth excludes complex orders from its flow-through calculations, the following information should accompany a future Section 271 application: (1) a clear definition of complex orders for CLECs and BellSouth; (2) a demonstration of how BellSouth handles complex orders for its retail customers and CLECs; (3) evidence that complex orders are processed in a nondiscriminatory manner (i.e., performance results and analysis).

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[1] *Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-region, InterLATA Services in Louisiana*, CC Docket No. 98-121, Memorandum Opinion and Order, FCC 98-271 (*BellSouth Louisiana II 271 Order*).

The Bureau Staff also stated its view that BellSouth could exclude from its flow-through calculation orders submitted by CLECs that contained CLEC-caused errors. The Bureau Staff stated its view that the flow-through calculation could be adjusted to exclude CLEC errors, if, in a future Section 271 application, BellSouth (1) defines more clearly what constitutes a CLEC error; and (2) verifies the cause of the errors as being CLEC errors (e.g., through an independent audit).

In response to questions about the appropriate level of disaggregation, the Bureau Staff indicated its view that the proposed levels of disaggregation listed in the *OSS Model Rules NPRM*[5] were appropriate.

2. TAFI Integration

Issue: (1) Whether BellSouth must provide a machine-to-machine repair and maintenance interface in order to meet the nondiscrimination requirement. (2) Absent a machine-to-machine repair and maintenance interface, what evidence is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response: The Bureau Staff stated its view that it did not believe that machine-to-machine repair and maintenance interface is *per se* required. The Bureau Staff noted that the Louisiana II Order found that a lack of machine-to-machine interface for repair and maintenance was not *per se* discriminatory. The Bureau Staff stated its view that, absent a machine-to-machine repair and maintenance interface, BellSouth must demonstrate that the interfaces offered to CLECs provide nondiscriminatory access. The Bureau Staff also stated that additional information was needed to assess the competitive impact that results from a lack of a machine-to-machine interface for repair and maintenance. In order to obtain such information, the Bureau Staff indicated that it would schedule additional meetings with interested parities.

The Bureau Staff stated its view that the following information would assist in evaluating in a future application whether BellSouth's repair and maintenance interface provide nondiscriminatory access: (1) a detailed description of the systems and functionality BellSouth utilizes itself for both designed and nondesigned services; (2) a detailed description of the systems and functionality BellSouth offers to competing carriers; (3) a discussion of what interface functionality competing carriers have requested through the change control process and the status of such request, if any; and (4) performance results for resold services and UNEs by interface type.

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[5] *See Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

3. Retail Analogues/Performance Standards/Statistical Measurements.

Issue. Methods of evaluating whether BellSouth's OSS performance meets the nondiscrimination requirement.

Bureau Staff Response. The Bureau Staff asked BellSouth to propose a framework for evaluating whether it is providing nondiscriminatory access to OSS functions and suggested that BellSouth include the following criteria:

- Relevant performance measurements;
- Identification of retail analogues, including level of disaggregation;
- Identification of a benchmark or performance standard where no retail analogue exists (e.g., based on state approved intervals, engineering studies, or other standards);
- A statistical methodology which is used to compare actual performance results to retail analogues or benchmarks;
- A threshold for determining whether differences in performance are competitively significant and whether analysis of the underlying cause for the difference is needed;
- An open process for analyzing the underlying cause for differences of performance;
- Meaningful penalty amounts to prevent "backsliding."

The Bureau Staff also indicated that it would seek industry comment of any framework for evaluating OSS performance proposed by BellSouth.

4. Complex Ordering/Partial Migration Orders.

Issue. Whether partial migration and directory listing need to be ordered electronically.

Bureau Staff Response. The Bureau Staff stated its view that there is no retail analog for partial migration orders, and that electronic ordering capability is not required at this time. The Bureau Staff stated its view that BellSouth must demonstrate that the ordering process for complex/partial migration orders meets the nondiscrimination requirement (e.g., provides an efficient competitor a meaningful opportunity to compete). The Bureau Staff also stated its

view that BellSouth should continue upgrading its OSS ordering interface through the change control process.

5. **Third-Party Testing – Demonstration of Operational Readiness.**

Issue. In cases where there is little or no commercial usage of an interface, whether BellSouth must engage in third-party testing at the level implemented by Bell Atlantic in New York.

Bureau Staff Response. The Bureau Staff noted that, in its view, internal testing cannot overcome evidence from commercial usage demonstrating inferior service to CLECs. The Bureau Staff stated its view that, where there is no commercial usage or inconclusive commercial usage exists, some form of testing is necessary to demonstrate that the BOC's OSS is operationally ready. The Bureau Staff indicated its view that, while it could not conclude, in the absence of a factual record, whether some forms of internal testing or carrier to carrier testing could demonstrate operational readiness, a third party test would serve as a reasonable "safe harbor." The Bureau Staff noted as two examples of such tests underway in New York and Texas. The Bureau Staff stressed the importance, in its view, of a test plan that included input from interested parties and includes meaningful independent review (e.g., State Commission oversight).

For information purposes, a copy of this letter will be placed in all open section 271 dockets.

Sincerely,

Lawrence E. Strickling

Lawrence E. Strickling, Chief
Common Carrier Bureau
Federal Communications Commission

cc: Ms. Magalie Roman Salas
Secretary
Federal Communications Commission

AT&T

Robert W. Quinn, Jr.
Director - Federal Government Affairs

Suite 1000
1120 20th St., NW
Washington, DC 20036
202 457-3851
FAX 202 457-2545

February 18, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte meeting
Second Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121

Dear Ms. Roman Salas:

On Wednesday, February 17, 1999, Jay Bradbury, David Eppsteiner, and I, of AT&T, Michael Hou of Community Network, and Karen Reidy and Bryan Greene of MCI, met with Claudia Fox, Jake Jennings, Andrea Kearney, and Claudia Pabo of the Common Carrier Bureau. At the request of Commission staff, the parties reviewed their position of record in this proceeding with an emphasis on the need for a nondiscriminatory machine-to-machine interface for maintenance and repair using the enclosed materials. In sum, we emphasized the dual entry issues (increased errors and cost) imposed with the lack of a machine-to-machine interface that were previously identified by the Commission as the reason machine-to-machine interfaces are required for pre-ordering/ordering functions.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Robert W. Quinn, Jr.

Attachment

cc: Claudia Fox
Jake Jennings
Andrea Kearney
Claudia Pabo

The Need For A Machine-to-Machine Maintenance and Repair Interface

The Competitive Impact

- If CLECs Hope to Compete With Incumbents, They Must Provide Better Customer Service and Lower Prices
  - All Customer Needs Must Addressed On Each Customer Contact
  - A CLEC Must Be Able To Efficiently Access All of An Individual Customer's Data On Every Call
  - Therefore, CLECs Must Be Able to Access Their Data As Well As ILEC Data

Why A Machine-to-Machine Repair Interface Is Necessary

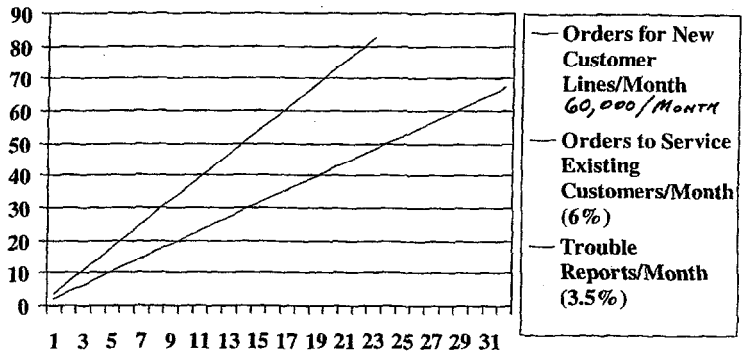
- Billing Data
  - Recurring Repairs Require Customer Credits
- Existing Services
  - Must Be Able to Add/Change Services
  - Must Be Able to Adjust Existing Calling Plans
- CSR Data
  - Necessary to Keep Contact Information Up-to-Date

Why A Machine-to-Machine Repair Interface Is Necessary

- Maintenance and Repair Volumes Will Quickly Equal New Order Volumes
  - Approximately 4% Of Lines Are Treated Monthly
  - 20%-30% of "Non-Migration" Accounts Are Treated Initially
  - Within 2 1/2 Years, Most CLECs Will Be At 1/3 Maintenance and Repair Calls; 1/3 Change Order Calls; and 1/3 New Service Calls

Hypothetical CLEC Business Plan

(7% Penetration of a 25M Line ILEC in 30 Months)



Why A Machine-to-Machine Repair Interface Is Necessary

- M & R Performance Information Is Essential
  - Real Time Access to Call Volume and Connect Time Data is Required for Efficient Staffing
  - CLEC Created Interval and Response Data Necessary to Ensure Parity
  - Without a CLEC's Own Database, CLECs are Left With Monthly RBOC Reports

Additional Cost Incurred Due to Dual Entry

- Lack of Machine-to-Machine Requires CLEC to Engage in Dual Entry
  - Dual Entry Must Occur While Customer Is On-Line for CLEC to Provide Efficient Customer Service Which Incumbent Representative Does Not
  - Dual Entry Is More Time Consuming And Results In More Mistakes, Requiring More Service Representatives